

Facility ID: 1431320434 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1431320434 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Post Folder and Gluer	OAC rule 3745-31-05(A)(3) 14-05813	Volatile Organic Compound (VOC) emissions shall not exceed 4.8 pounds per hour and 2.50 tons per year. See terms and conditions A.2.a, A.2.c and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). See term A.2.b.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid title V permitting)	See term A.2.b.
	OAC rule 3745-21-09(F)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The VOC content of the adhesives used in this emissions unit shall not exceed 5.0 percent by weight, as applied.
 The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Paper coating line for corrugated shipping containers), K002 [Sheet-fed flexographic printing press with folder/gluer (PTI 14-4040)], K003 [Sheet-fed flexographic printing press with folder/gluer (PTI 14-4819)], K004 [Post Folder and Gluer (PTI 14-05713)], P002 (Corrugator mixing tank), R002 (Langston flexographic press with folder/gluer), R004 (United rotary press with die cutter) including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
 The hourly emissions limitation specified above is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this emission limitation. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings, the material usage limitations and the emission limitations.

B. Operational Restrictions

1. The adhesives used in this emissions unit shall not exceed 100,000 pounds per year.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the company identification of the adhesive employed;
 - b. the amount, in pounds, of each adhesive, as applied;
 - c. the VOC content of each adhesive, as applied, in percent by weight; and,
 - d. the total VOC emissions from all adhesives, in pounds (summation of b x c).

2. The permittee shall maintain annual records of the following information for this emissions unit:
 - a. the total amount of adhesive, in pounds, as applied (the summation of C.1.b for all months during the calendar year);
 - b. the total annual VOC emissions, in TPY (the summation of C.1.d for all months during the calendar year, divided by 2000).
3. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.b:
 - a. The name and identification number of each coating (ink and adhesive) employed;
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating (ink and adhesive) in pounds of individual HAP per pound of coating (ink and adhesive), or by percent by weight as applied;
 - c. The total combined HAP content of each coating (ink and adhesive) in pounds of combined HAPs per pound of coating (ink and adhesive), or by percent by weight as applied [sum all the individual HAP contents from (b)];
 - d. The number of pounds of each coating (ink and adhesive) employed;
 - e. The name and identification of each cleanup material employed;
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, or by percent by weight as applied;
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, or by percent by weight as applied [sum all the individual HAP contents from (f)];
 - h. The number of gallons or pounds of each cleanup material employed;
 - i. The total individual HAP emissions for each HAP from all coatings (inks and adhesives) and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times the emissions factor (if applicable) for each coating (ink and adhesive) plus the sum of (f) times (h) for each cleanup material];
 - j. The total combined HAP emissions from all coatings (inks and adhesives) and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times the emissions factor (if applicable) for each coating (ink and adhesive) plus the sum of (g) times (h) for each cleanup material];
 - k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - l. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Hamilton County Department of Environmental Services. This information does not have to be kept on a individual emissions unit basis.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the VOC content, in percent by weight, exceeds the applicable limitations specified in Section A.2 of this permit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports that specify the total VOC emissions (in TPY) from this emission unit and the total amounts (in pounds) of adhesive employed for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.b. If no deviations occurred during the reporting period, the permittee shall state so in the report.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

E. Testing Requirements

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 4.8 pounds per hour.

Applicable Compliance Method:

The hourly emission limitation was developed with the following calculation:

96 pounds of adhesive/hour (maximum hourly adhesive usage rate) x 0.05 pound of VOC/pound of adhesive (maximum VOC content of adhesive) = 4.8 pounds per hour of VOC.

Emission Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 2.50 tons per year.

Applicable Compliance Methods:

The annual emission limitation was developed using the following calculation:

100,000 pounds of adhesive/year (maximum adhesive usage rate) x 0.05 pounds of VOC/pound of adhesive (maximum VOC content of adhesive) x ton/2000 pounds = 2.5 tons per year of VOC.

Compliance with the annual VOC emission limitation shall be determined by the record keeping requirements specified in term C.2.

Compliance with the HAPs emission limitations in term A.2.b shall be determined by the record keeping requirements specified in term C.3.

2. USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Compliance with the material usage limitation in term B.1 shall be determined by the record keeping requirements specified in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D and E.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.