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Facility Name: **Neff Company**

Application Number: **08-3958**

Date: **March 17, 1999**

**GENERAL PERMIT CONDITIONS**

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

### **PUBLIC DISCLOSURE**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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### **BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Neff Company** located in **Darke** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio  
EPA  
Source  
Number

K001

K003	K005	K007	K009
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K002

K004	K006	K008	K010
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K011	Multi 1650 MC lithographic offset printer no. 1	Screen printer no. 1, metal plaques	Screen printer no. 4, certificates	Screen printer no. 7, decals
	Multi 1650 MC lithographic offset printer no. 2	Screen printer no. 2, metal plaques	Screen printer no. 5, decals	Screen printer no. 8, decals
		Screen printer no. 3, certificates	Screen printer no. 6, decals	Special products solvent cleanup

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	<u>BAT</u> <u>Determination</u>	<u>Applicable Federal</u> <u>&amp; OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
dip tank	<u>BAT</u> <u>Determination</u>	Compliance with applicable OAC rules and specified allowable mass emission rates; recordkeeping; and reporting	emission rates; recordkeeping; and reporting	Compliance with applicable OAC rules and specified allowable mass emission rates; recordkeeping; and reporting
		Compliance with applicable OAC rules and specified allowable mass emission rates; recordkeeping; and reporting	Compliance with applicable OAC rules and specified allowable mass emission rates; recordkeeping; and reporting	Compliance with applicable OAC rules and specified allowable mass emission rates; recordkeeping; and reporting
		Compliance with applicable OAC rules and specified allowable mass emission rates; recordkeeping; and reporting	Compliance with applicable OAC rules and specified allowable mass emission rates; recordkeeping; and reporting	Compliance with applicable OAC rules and specified allowable mass emission rates;
		Compliance with applicable OAC rules and specified allowable mass		

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
recordkeeping; and reporting		3745-31-05	3745-21-07 (G) (2)	
	Applicable Federal & OAC Rules		3745-31-05	3745-21-07 (G) (2)
	3745-31-05			3745-31-05
Compliance with applicable OAC rules and specified allowable mass emission rates; OC content limitation; recordkeeping; and reporting		3745-21-07 (G) (2)		
		3745-31-05	3745-21-07 (G) (2)	
	3745-21-07 (G) (2)		3745-31-05	3745-21-07 (G) (2)
	3745-31-05			3745-31-05
		3745-21-07 (G) (2)		
		3745-31-05	3745-21-07 (G) (2)	
			3745-31-05	3745-21-07 (G) (2)
	3745-21-07 (G) (2)			3745-31-05

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
3745-21-09 (O)	Permit Allowable Mass Emissions and/or Control/Usage Requirements	2.35 TPY OC, including cleanup;	excluding cleanup;	0.26 pound/hour and 6.24 pounds/day OC, excluding cleanup;
		Less stringent than the OC limits above	1.69 TPY OC, including cleanup;	1.95 TPY OC, including cleanup;
		0.33 pound/hour and 7.92 pounds/day OC excluding cleanup;	Less stringent than the OC limits above	Less stringent than the OC limits above
		0.09 pound/hour and 2.16 pounds/day Organic compounds (OC), excluding cleanup;	1.69 TPY OC, including cleanup;	0.26 pound/hour and 6.24 pounds/day OC, excluding cleanup;
		Less stringent than the OC limits above	Less stringent than the OC limits above	0.26 pound/hour and 6.24 pounds/day OC, excluding cleanup;
		2.35 TPY OC, including cleanup;	1.69 TPY OC, including cleanup;	1.95 TPY OC, including cleanup;
		Less stringent than the OC limits above	Less stringent than the OC limits above	Less stringent than the OC limits above
		0.09 pound/hour and 2.16 pounds/day Organic compounds (OC), excluding cleanup;	1.69 TPY OC, including cleanup;	0.26 pound/hour and 6.24 pounds/day OC, excluding cleanup;
		Less stringent than the OC limits above	Less stringent than the OC limits above	1.95 TPY OC, including cleanup;
		0.33 pound/hour and 7.92 pounds/day OC, excluding cleanup;	Less stringent than the OC limits above	Less stringent than the OC limits above

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SUMMARY  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compounds	27.83

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Regional Air Pollution Control, 451 West Third Street, Dayton, OH 45422.**

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Additional Terms and Conditions**

1. The 0.09 lb/hour and 2.16 lbs/day OC limits for emissions units K001 and

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K002 have been established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish recordkeeping and/or reporting requirements to ensure compliance with these limits.

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2. The 0.33 lb/hour and 7.92 lbs/day OC limits for emissions units K003, K004, K005, and K006 have been established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish recordkeeping and/or reporting requirements to ensure compliance with these limits.
3. The 0.26 lb/hour and 6.24 lbs/day OC limits for emissions units K007, K008, K009, and K010 have been established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish recordkeeping and/or reporting requirements to ensure compliance with these limits.

**B. Operational Restrictions**

1. The cold cleaner (emissions unit L001) shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
2. The cold cleaner (emissions unit L001) shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.
3. The cold cleaner (emissions unit L001) shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
  - a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;
  - b. store waste solvent in covered containers;
  - c. close the cover whenever parts are not being handled in the cleaner;

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- d. drain the cleaned parts until dripping ceases;
- e. if used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge; and,
- f. clean only materials that are neither porous nor absorbent.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the lithographic offset printing presses No. 1 and 2 (emissions units K001 and K002) combined:
  - a. the name and identification of each ink and cleanup material employed;
  - b. the OC content of each ink and cleanup material, in pounds per gallon;
  - c. the number of gallons of each ink and cleanup material employed;
  - d. the total OC emissions from all inks and cleanup materials employed, in pounds or tons; and,
  - e. the total OC emissions from all inks and cleanup materials for each emissions unit, i.e., (d)/2.
2. The permittee shall collect and record the following information each month for the metal plaque screen printing presses No. 1 and 2 (emissions units K003 and K004) combined:
  - a. the name and identification of each ink and cleanup material employed;
  - b. the OC content of each ink and cleanup material, in pounds per gallon;
  - c. the number of gallons of each ink and cleanup material employed;
  - d. the total OC emissions from all inks and cleanup materials employed, in pounds or tons; and,
  - e. the total OC emissions from all inks and cleanup materials for each

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emissions unit, i.e., (d)/2.

3. The permittee shall collect and record the following information each month for the certificate screen printing presses No. 3 and 4 (emissions units K005 and K006) combined:
  - a. the name and identification of each ink and cleanup material employed;

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- b. the OC content of each ink and cleanup material, in pounds per gallon;
  - c. the number of gallons of each ink and cleanup material employed;
  - d. the total OC emissions from all inks and cleanup materials employed, in pounds or tons; and,
  - e. the total OC emissions from all inks and cleanup materials for each emissions unit, i.e., (d)/2.
4. The permittee shall collect and record the following information each month for the decal screen printing presses Nos. 5, 6, 7 and 8 (emissions units K007, K008, K009 and K010) combined:
  - a. the name and identification of each ink and cleanup material employed;
  - b. the OC content of each ink and cleanup material, in pounds per gallon;
  - c. the number of gallons of each ink and cleanup material employed;
  - d. the total OC emissions from all inks and cleanup materials employed, in pounds or tons; and,
  - e. the total OC emissions from all inks and cleanup materials for each emissions unit, i.e., (d)/4.
5. The permittee shall collect and record the following information each month for the special products solvent cold cleaner (emissions unit L001):
  - a. the name and identification number of the solvents employed in the cold cleaner;
  - b. the VOC content of the solvents employed, in pounds per gallon;
  - c. the number of gallons of solvent employed;
  - d. the number of gallons of solvent recycled or disposed; and,

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- e. the total VOC emissions, in pounds or tons per month.
6. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and K010 for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall notify the Director (the Regional Air Pollution Control Agency) in writing of any monthly record showing the use of noncomplying cleanup solvents in emissions unit L001. The notification shall include a copy of such record and shall be sent to the Director (the Regional Air Pollution Control Agency) within 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each month during which the organic compound emissions from the cleanup solvent materials in emissions unit L001 exceeded 1428 pounds per month, and the actual organic compound emissions for each such month.
4. These quarterly deviation (excursion) reports shall be submitted in the following manner:
  - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Regional Air Pollution Control Agency; and,
  - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any

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deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventative measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

#### **E. Testing Requirements and Compliance Determinations**

1. Compliance with the emission limitations of these terms and conditions for emissions units K001 and K002 shall be determined in accordance with the following method(s):

- a. Emission Limitation

0.09 lb/hour OC, excluding cleanup

Applicable Compliance Method

Compliance shall be determined by multiplying the maximum hourly ink usage by the maximum OC content of all inks employed.

- b. Emission Limitation

2.16 lbs/day OC, excluding cleanup

Applicable Compliance Method

The 2.16 lbs/day OC limit was developed by multiplying the hourly allowable emission rate of 0.09 lb/hour OC by the maximum daily operating schedule of 24 hours/day.

- c. Emission Limitation

2.35 TPY OC, including cleanup

Applicable Compliance Method

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Compliance shall be based upon recordkeeping as specified in C.1. and shall be the sum of the twelve monthly OC emission rates for the calendar year.

2. Compliance with the emission limitations of these terms and conditions for emissions units K003 and K004 shall be determined in accordance with the following method(s):
  - a. Emission Limitation  
0.33 lb/hour OC, excluding cleanup

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Applicable Compliance Method

Compliance shall be determined by multiplying the maximum hourly ink usage by the maximum allowable OC content of inks employed.

b. Emission Limitation

1.69 TPY OC, including cleanup

Applicable Compliance Method

Compliance shall be based upon recordkeeping as specified in C.3. and shall be the sum of the twelve monthly OC emission rates for the calendar year.

c. Emission Limitation

3.3 lbs OC/gallon, excluding water and exempt solvents

Applicable Compliance Method

Formulation data or USEPA Reference Method 24A shall be used to determine the organic compound content of the inks.

3. Compliance with the emission limitations of these terms and conditions for emissions units K005 and K006 shall be determined in accordance with the following method(s):

a. Emission Limitation

0.33 lb/hour OC, excluding cleanup

Applicable Compliance Method

Compliance shall be determined by multiplying the maximum hourly ink usage by the maximum OC content of all inks employed.

b. Emission Limitation

7.92 lbs/day OC, excluding cleanup

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Applicable Compliance Method

The 7.92 lbs/day OC limit was developed by multiplying the hourly allowable emission rate of 0.33 lb/hour OC by the maximum daily operating schedule of 24 hours/day.

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c. Emission Limitation

1.69 TPY OC, including cleanup

Applicable Compliance Method

Compliance shall be based upon recordkeeping as specified in C.4. and shall be the sum of the twelve monthly OC emission rates for the calendar year.

4. Compliance with the emission limitations of these terms and conditions for emissions units K007, K008, K009 and K010 shall be determined in accordance with the following method(s):

a. Emission Limitation

0.26 lb/hour OC, excluding cleanup

Applicable Compliance Method

Compliance shall be determined by multiplying the maximum hourly ink usage by the maximum OC content of all inks employed.

b. Emission Limitation

6.24 lbs/day OC, excluding cleanup

Applicable Compliance Method

The 6.24 lbs/day OC limit was developed by multiplying the hourly allowable emission rate of 0.26 lb/hour OC by the maximum daily operating schedule of 24 hours/day.

c. Emission Limitation

1.95 TPY OC, including cleanup

Applicable Compliance Method

Compliance shall be based upon recordkeeping as specified in C.5. and shall be the sum of the twelve monthly OC emission rates

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for the calendar year.

5. Compliance with the emission limitations of these terms and conditions for emissions unit L001 shall be determined in accordance with the following method(s):

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a. Emission Limitation

1428 lbs/month VOC

Applicable Compliance Method

Compliance shall be based upon recordkeeping as specified in C.6.

b. Emission Limitation

8.57 TPY VOC

Applicable Compliance Method

Compliance shall be based upon recordkeeping as specified in C.6. and shall be the sum of the twelve monthly VOC emission rates for the calendar year.