

Facility ID: 1431420497 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: 1431420497 Emissions Unit ID: K014 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>
6-Color Flexographic Printing Press No. 13	OAC rule 3745-31-05 (PTI 14-4551)	8.4 LBS/HR VOC* 36.8 TPY VOC
		See A.2.2.b.
	40 CFR Part 63, Subpart KK OAC rule 3745-21-09(Y)(1)(a)	* The hourly emission limitation is based on the emissions unit's PTE. Therefore, no hourly records are required to demonstrate compliance with these limits. See A.2.2.a. and C.1. See A.2.2.c.

**2. Additional Terms and Conditions**

- (a) The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY as a rolling, 12-month summation for any single HAP and 25 TPY as a rolling, 12-month summation for the combination of all HAPs. The combined annual VOC emissions from flexographic printing presses #1, #2, #4, #5, #6, #7, #10, #12 and #13 ( OPEA emissions units K001, K002, K004-K007, K010, K013 and K014) at Amko Plastics shall not exceed 8 tons per month and 96 tons per year. The VOC content of each coating employed in this emissions unit shall not exceed the following limitations:
  - a. forty (40%) percent VOC by volume of the coating, excluding water and exempt solvents, as applied; or
  - b. twenty-five (25%) percent VOC by volume of the volatile matter in the coating, as applied.

**B. Operational Restrictions**

None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for all emissions units at this facility:
  - a. The name and identification number for each coating and cleanup material employed.
  - b. The individual HAP content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of material, as applied.
  - c. The total combined HAPs content of each coating and cleanup material, in pounds of combined HAPs per gallon of material, as applied [sum all the individual HAP contents from (b)].
  - d. The VOC content of each coating and cleanup material employed, in pounds per gallon, as applied.
  - e. The percent VOC by volume of each coating (excluding water and exempt solvents), as applied, and the percent VOC by volume of the volatile matter in each coating.
  - f. The number of gallons of each coating and cleanup material employed.

- g. The total combined VOC emissions from all coatings and cleanup materials, in pounds or tons per month [the sum of (d) times (f) for each coating and cleanup material].
- h. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP, the sum of (b) times (f) for each coating and cleanup material].
- i. The total combined HAPs emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (f) for each coating and cleanup material].
  - j. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- k. The updated rolling, 12-month summation for total combined HAPs 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 your Ohio EPA District Office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 2. All records required by this Permit to Operate shall be retained on file for a period of not less than five years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**D. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
- 2. The permittee shall submit annual reports which specify the VOC emissions for each month from all flexographic printing presses at this facility. These reports shall be submitted by January 31 of each year.
- 3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings (for VOC content). 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.

**E. Testing Requirements**

- 1. Compliance with the annual VOC and HAP emission limitations in these terms and conditions shall be demonstrated by the recordkeeping in T&C C.1.
- 2. Compliance with the VOC content limitations in these terms and conditions shall be determined in accordance with USEPA Method 24A. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 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 24A.

**F. Miscellaneous Requirements**

None