

Facility ID: 1431420497 Issuance type: Final State Permit To Operate

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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: K015 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>
4-color flexographic printing press #8	OAC rule 3745-31-05 (PTI 14-4715)	9.73 lbs of volatile organic compounds (VOC)/hr and 42.62 TPY of VOC
	40 CFR, Part 63, Subpart KK	See A.2.c. exempt, pursuant to A.2.b
	OAC rule 3745-21-09(Y)(1)(a)	See A.2.a.

2. Additional Terms and Conditions

- (a) The VOC content of the inks employed in this emissions unit shall not exceed the following limitations:
 - i. 40% VOC by volume of any ink, excluding water, or
 - ii. 25% VOC by volume of volatile matter in any ink.
 The emissions of the Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY as a rolling, 12-month summation for any single HAP and 24.9 TPY as a rolling, 12-month summation for any combination of HAPs.
 The combined annual VOC emissions from flexographic printing presses #1, #2, #4, #5, #6, #7, #8, #10, #12, and #13 (OEPA emissions units K001, K002, K004-K007, K010, K013, K014, and K015) at Amko Plastics, Inc. shall not exceed 8 tons per month and 96 tons per year.
 The hourly and annual VOC emission limitations outlined in this permit are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum combined annual ink usage for flexographic printing presses #1, #2, #4, #5, #6, #7, #8, #10, #12, and #13 (OEPA emissions units K001, K002, K004-K007, K010, K013, K014, and K015) at Amko Plastics Inc. shall not exceed 125,000 gallons per year, based upon a rolling, 12-month summation of the ink usages.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number for each ink employed.
 - b. The individual HAP content for each HAP of each ink, in pounds of individual HAP per gallon of material, as applied.
 - c. The total combined HAP content of each ink, in pounds of combined HAP per gallon of material, as applied.
 - d. The VOC content of the inks used in pounds per gallon, as applied.
 - e. The percent VOC by volume of each ink (excluding water), as applied, or the percent VOC by volume of the volatile matter in each ink.
 - f. The number of gallons of each ink employed.
 - g. The total combined VOC emissions in tons per month [the summation of (d x f) for each ink].

- h. The total individual HAP emissions for each HAP from all inks employed in tons per month [for each HAP the summation of (b x f) for each ink divided by 2000].
- i. The total combined HAP emissions from all inks employed in tons per month [the summation of (c x f) for each ink divided by 2000].
- j. The updated rolling, 12-month summation for individual HAP emissions for each HAP in tons. This shall include the information for the current month and the preceding 11 calendar months.
- k. The updated rolling, 12-month summation for total combined HAP emissions in tons. This shall include the information for the current month and the preceding 11 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 Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

2. The permittee shall collect and record the following information for each change where the air toxics modeling was required pursuant to the Air Toxics Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.) and
- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxics Policy for the change.
3. The permittee shall maintain monthly records of the following information for emissions units K001, K002, K004-K007, K010, K013, K014, and K015:
- a. The ink usage for each month.
- b. The rolling, 12-month summation of the ink usage figures.

Also, during the first 12-months of operation, the permittee shall record the cumulative ink usage for each calendar month.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this permit. 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 quarterly reports which specify the VOC emissions for each month from all flexographic printing presses at Amko Plastics Inc. These reports are for the previous three months and are due January 30, April 30, July 30, and October 30 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 inks (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director of the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month ink usage restriction. These reports are due by the date specified in Part I, section 3 of this permit.
5. The permittee shall submit an initial notification as required by 40 CFR, Part 63.830(b)(1).

E. Testing Requirements

1. Compliance with the emission limitations specified in sections A.1. and A.2. and the usage restriction specified in section B of these terms and conditions shall be determined in accordance with the following methods:
- Emission Limitation -
9.73 lbs of VOC/hr
- Applicable Compliance Method -
Compliance with the above hourly emission limitation shall be determined by multiplying the maximum hourly ink usage (gallons/hr) by the maximum VOC content of all the inks (lbs of VOC/gallon of ink).
- Emission Limitation -
42.62 TPY of VOC
- Applicable Compliance Method -
Compliance with the above annual VOC emission limitation is shown as long as compliance with the hourly VOC limitation is maintained (the annual VOC limitation was calculated by multiplying the hourly VOC limitation by 8,760 and dividing by 2000).
- Emission Limitation -
40 % VOC by volume of any ink, excluding water or
25 % VOC by volume of volatile matter in any ink
- Applicable Compliance Method -
Compliance with the above emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.
- Emission Limitation -
24.9 tons/rolling, 12-month summation (for all HAPs combined)
9.9 tons/rolling, 12-month summation (for any individual HAP)
- Applicable Compliance Method -
Compliance with the HAP limitations shall be determined by the record keeping requirements in section C.1. of the terms and conditions of this permit.

- Emission Limitation -
8 tons of VOC/month for emissions units K001, K002, K004-K007, K010, K013, K014, and K015 combined
- Applicable Compliance Method -
Compliance with the above monthly emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit.
- Emission Limitation -
96 tons of VOC/year for emissions units K001, K002, K004-K007, K010, K013, K014, and K015 combined
- Applicable Compliance Method -
Compliance with the above yearly emission limitation shall be determined by the record keeping in section C.1. of the terms and conditions of this permit and shall be the sum of the monthly VOC emissions for the calendar year.
- Usage Restriction -
125,000 gallons of ink per rolling, 12-month period
- Applicable Compliance Method -
Compliance with the above annual ink usage restriction shall be determined by the record keeping in section C.3. of the terms and conditions of this permit.
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 ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and inks specified by the permittee in the permit to install application for this emissions unit). To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxics Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxics Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:
- Pollutant: Ammonia
TLV (ug/m3): 17,000
Maximum Hourly Emission Rate (lbs/hr): 0.19
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 104
MAGLC (ug/m3): 405
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 the following changes to the process may be determined to be a "modification":
- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table.
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height).
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted.
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31.
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install.
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxics Policy, determines that the changed emissions unit still satisfies the Air Toxics Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxics Policy for the change.
- For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.