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: K017 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
4 color flexographic printing press No. 11	OAC rule 3745-31-05(A)(3) (PTI 14-05115)	2.34 lbs/hr VOC 10.25 TPY VOC 0.29 lb/hr ammonia 1.27 TPY ammonia The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(D) and 40 CFR Part 63 Subpart KK.
	OAC rule 3745-31-05(D) (PTI 14-05115)	See terms A.2.c. and B.1.
	40 CFR Part 63 Subpart KK	See term A.2.a.
	OAC rule 3745-21-09(Y)(1)(a)	See term A.2.b.

2. **Additional Terms and Conditions**

   (a) The actual usage of 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 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 VOC content of the coatings and inks employed in emissions unit K017 shall not exceed the following limitations:

   i. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or

   ii. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.
   The combined annual VOC emissions from flexographic printing presses #1, #2, #4, #5, #6, #7, #10, #12, #3, #8, #9, #11 and #13 (OEPA emissions units K001, K002, K004, K005, K006, K007, K010, K013, K014, K015, K016, K017 and K018) at Ampac Plastics, Inc. shall not exceed 8 tons per month and 96 tons per year.
   The hourly and annual emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. **Operational Restrictions**

1. The maximum combined annual coating usage from flexographic printing presses #1, #2, #4, #5, #6, #7, #10, #12, #3, #8, #9, #11 and #13 (OEPA emissions units K001, K002, K004, K005, K006, K007, K010, K013, K014, K015, K016, K017 and K018) at Ampac Plastics, Inc. shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

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 coating and cleanup material employed.

   b. The individual Hazardous Air Pollutant (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 HAP 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 the coatings and cleanup materials used in pounds per gallon, as applied.

e. The percent VOC by volume of each coating and cleanup material (excluding water), as applied, or the percent VOC by volume of the volatile matter in the coating.

f. The number of gallons of each coating and cleanup material employed.

g. The total combined VOC emissions, in pounds or tons per month [the sum of (d) times (f) for each coating and cleanup material].

h. The total individual HAP usage 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 HAP usage 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 of usage for each individual 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 of usage for total combined HAPs, 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 field office or local air agency contact. This information does not have to be kept on a line-by-line basis. The HAP recordkeeping is required by 40 CFR Part 63.830(b)(1).

2. The permittee shall collect and record the following information each month:

a. The coating usage for each month.

b. The rolling, 12-month summation of the coating usage figures.

3. The permit to install for this emissions unit (K016, K017 and K018) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ammonia
TLV (ug/m3): 17,410
Maximum Hourly Emission Rate (lbs/hr): 0.81 (for emissions units K016, K017 and K018)
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 246
MAGLC (ug/m3): 414.5
Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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 previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy":

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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 term A.2.a. 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 total VOC emissions for each month from all flexographic printing presses (OEPA emissions units K001, K002, K004, K005, K006, K007, K010, K013, K014, K015, K016, K017 and K018) at Ampac Plastics, Inc. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. 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.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month coating usage limitation.

5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. **Testing Requirements**

1. Compliance with the VOC and HAPs emission limitations in terms A.2.a and A.2.c shall be demonstrated by the record keeping requirements specified in term 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.

3. Compliance with the coating usage limitation in term B.1 shall be demonstrated by the recordkeeping requirements specified in term C.2.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.2., D and E.

2. The terms and conditions in permit to install (PTI) 14-05115 issued on September 18, 2001 shall supersede PTI 14-01379 issued on April 26, 1989, PTI 14-03925 issued on December 6, 1995, PTI 14-04551 issued on July 15, 1998, PTI 14-04715 issued on August 11, 1999 and PTI 14-05070 issued on March 20, 2001.