

Facility ID: 1483020331 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: 1483020331 Emissions Unit ID: K010 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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	OAC rule 3745-31-05 (PTI 14-4680)	1.0 lb of volatile organic compound (VOC)/hr; 4.12 tons per year (TPY) of VOC
		The hourly emission limitation above is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(i).
		See A.2. below.
	OAC rule 3745-21-09(Y)(1)(a)(i)	Forty percent VOC by volume of each ink, excluding water and exempt solvents.

2. **Additional Terms and Conditions**
 - (a) The VOC content of each ink as applied, shall not exceed 0.59 pound of VOC per gallon of ink. The VOC content of each cleanup material employed shall not exceed 1.0 pound of VOC per gallon of cleanup material.

B. Operational Restrictions

1. The maximum annual ink usage for this emissions unit shall not exceed 13,350 gallons per year.
2. The maximum annual cleanup material usage for this emissions unit shall not exceed 1,159 gallons per year.
3. To ensure that the evaporative organic compound (VOC) loss from the hand cleanup process does not exceed more than 75 percent (by weight) from solvents having a vapor pressure greater than 10 mmHg (0.19 pound per square inch absolute (psia)) at 20 degrees Celsius (68 degrees Fahrenheit), all rags utilized in the cleanup process shall be stored in containers with tight-fitting covers.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the name and identification number of each ink and cleanup material employed;
 - b. the number of gallons of each ink (including water and exempt solvents), as applied;
 - c. the VOC content of each ink, in pounds per gallon (including water and exempt solvents), as applied;
 - d. the percent VOC by volume of each ink, excluding water and exempt solvents;
 - e. the number of gallons of each cleanup material employed;
 - f. the VOC content of each cleanup material, in pounds per gallon;

- g. the total VOC emissions from all inks and cleanup materials employed, in tons [summation of (b x c) for all inks + summation of (e x f) for all cleanup materials/2000].
 - h. the total number of gallons of ink [summation of (b) for all inks];
 - i. the total number of gallons of cleanup materials used [summation of (e) for all cleanup materials]; and
 - j. the total number of hours of operation each month.
- 2. The permittee shall maintain annual records of the following information for this emissions unit:
 - a. The total number of gallons of ink, as applied (the summation of C.1.b for all months during the calendar year);
 - b. The total number of gallons of cleanup material employed (the summation of C.1.e for all months during the calendar year); and
 - c. The annual VOC emissions total, in TPY (the summation of C.1.g for all months during the calendar year).
- D. **Reporting Requirements**
 - 1. The permittee shall notify Hamilton County Department of Environmental Services in writing of any monthly record showing the use of any ink or cleanup material exceeding the VOC content limitations in A.1 and A.2. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
 - 2. The permittee shall submit annual reports which identify the total ink usage, total cleanup material usage, and the total VOC emissions for the preceding calendar year. These reports shall be submitted by January 30 of each year and shall be sent to the Hamilton County Department of Environmental Services.
- E. **Testing Requirements**
 - 1. U.S. EPA Method 24A shall be used to determine the VOC content for flexographic printing inks. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24A. Formulation data or U.S. EPA Method 24 or 24A, whichever is appropriate, shall be used to determine the VOC content of cleanup materials.
 - 2. Compliance with the emissions limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
Emission Limitation: 1.0 lb/hr of VOC emissions

Applicable Compliance Method: Compliance with the emissions limit is determined by multiplying the maximum ink usage (gal/hr including water and exempt solvents) by the actual ink VOC content (lbs of VOC/gal including water and exempt solvents) or by emissions testing using in Method 25 or 25A, whichever is appropriate, of 40 CFR, Part 60, Appendix A.
Emission Limitation: 4.12 TPY of VOC emissions

Applicable Compliance Method: Compliance with the annual emissions limit shall be determined by the record keeping requirements specified in Section C.2.
 - 3. Compliance with the usage limitations in terms and conditions B.1 and B.2 shall be determined by the recordkeeping in Section C.2.
- F. **Miscellaneous Requirements**
 - 1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound is less than 1.0 ton. OAC Chapter 3745-31 requires a permittee 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 result in an increase in emissions of any pollutant that has a listed threshold limit value to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.