

Facility ID: 1483040357 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: 1483040357 Emissions Unit ID: K002 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-station (10" wide) flexographic printing press	OAC 3745-31-05 See F. OAC 3745-21-09(Y)(1) See F.	See A.2. Exempt per OAC 3745-21-09(Y)(2)(b).

2. Additional Terms and Conditions

- (a) The monthly VOC emissions from emissions units K001 and K002 shall not exceed the following:

water-based inks* 329 lbs VOC/month
solvent-based inks 1324 lbs VOC/month
mold inhibitors 1390 lbs VOC/month
cleanup 140 lbs VOC/month

total** 3183 lbs VOC/month

*The permittee may exceed the water-based inks emission limit provided that the total monthly VOC emissions limit for K001 and K002 is not exceeded.

**Minus VOC emissions from adhesives.

The annual VOC emissions from the use of adhesives in K001 and K002 shall not exceed 0.13 TPY. The annual VOC emissions from K001 and K002 shall not exceed 19.23 TPY (including the emissions from the use of adhesives).

The 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 for any single HAP and 25 TPY for any combination of HAPs.

B. Operational Restrictions

1. The permittee shall store all cleanup rags from K001 and K002 in closed containers with tight fitting covers.
2. The permittee shall continue to pursue a coating reformulation program to develop and employ low VOC inks.

C. Monitoring and/or Record Keeping Requirements

1. The permittee collect and record the following information each month for emissions units K001 and K002:
 - a. the name and identification of each water-based ink, solvent-based ink, inhibitor, cleanup material, and adhesive employed;
 - b. the usage rate of each water-based ink, solvent-based ink, inhibitor, cleanup material, and adhesive, in pounds;
 - c. the VOC content (as applied) of each water-based ink, solvent-based ink, inhibitor, cleanup material, and adhesive, in % by weight;
 - d. the VOC emissions from each water-based ink, solvent-based ink, inhibitor, cleanup material, and adhesive, in pounds (b. multiplied by c. above);
 - e. the VOC emissions from all water-based inks, all solvent-based inks, all inhibitors, all cleanup materials, and all adhesives, in pounds (the sum of d. for all water-based inks, all solvent-based inks, all inhibitors, all cleanup materials, and all adhesives);
 - f. the VOC emissions from all adhesives, in pounds;
 - g. the VOC emissions from all water-based inks, solvent-based inks, inhibitors, and cleanup materials,

combined, in pounds; and

h. the total VOC emissions from K001 and K002, in pounds (f. plus g.).

2. The permittee shall collect and record the following HAPs information each month for the entire facility:

- a. the name and identification of each HAP containing ink, inhibitor, cleanup material, and adhesive employed;
- b. the individual HAP content for each ink, inhibitor, cleanup material, and adhesive, in % by weight;
- c. the total combined HAP content for all inks, inhibitors, cleanup materials, and adhesives, in % by weight;
- d. the usage of each HAP containing ink, inhibitor, cleanup material, and adhesive, in pounds;
- e. the total individual HAP emissions for each HAP from all inks, inhibitors, cleanup materials, and adhesives (sum of b. multiplied by d.);
- f. the total combined HAP emissions from all inks, inhibitors, cleanup materials, and adhesives (sum of c. multiplied by d.).

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.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing an exceedance of the monthly VOC emissions limits in A.2.a.. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall submit annual reports which summarize the following for K001 and K002: the annual VOC emissions (excluding and including adhesives), the individual HAP emissions, and the combined HAP emissions. These reports shall be submitted by February 15 of each year and shall cover the previous calendar year.
3. The permittee shall submit an annual report regarding the progress of the ink and coating reformulation program. The permittee shall submit this report to the Ohio EPA district office or local air agency by February 15 of each year and shall cover the previous calendar year (January through December).

This report shall contain, at a minimum, any letters from ink and coating suppliers outlining efforts and results from any trial ink and coating application and any projected use of an alternative ink or coating.

E. Testing Requirements

1. Compliance with the monthly VOC emissions limitations in section A.2.a. shall be demonstrated by the record keeping requirements in section C.1.
2. Compliance with the annual VOC emissions limitations in sections A.2.b. and c. shall be demonstrated by the sum of the monthly emissions from section C.1.
3. Compliance with the annual HAP emissions limitations in section A.2.d. shall be demonstrated by the sum of the monthly emissions, as calculated in sections C.2.e. and C.2.d. above for each month in the calendar year (TPY).

F. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 14-3878 as issued on November 29, 1995: A - E.