

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: K001 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>
K001-7-station (10" wide) flexographic printing press	OAC rule 3745-31-05(A)(3) PTI 14-03878	Volatile Organic Compound (VOC) emissions shall not exceed 39.7 pounds per hour. Volatile Organic Compound (VOC) emissions shall not exceed 19.23 TPY from K001 and K002 combined. See terms A.2.a and A.2.b. See section B.1. The requirements of this rule also includes compliance with OAC rule 3745-31-05(C). See term A.2.c. Exempt pursuant to OAC rule 3745-21-09(Y)(2)(b). See term A.2.e.
	OAC rule 3745-31-05(C) OAC rule 3745-21-09(Y)(1)	

2. Additional Terms and Conditions

- (a) The permittee shall not exceed the following monthly emission limits for K001 and K002 combined:

water-based coatings and inks - 330.6 pounds/month
 solvent-based coatings and inks - 930.0 pounds/month
 mold inhibitors - 1788.0 pounds/month
 cleanup materials - 56.0 pounds/month

total monthly emissions limit = 3104.6 pounds/month

The water-based coatings and inks emissions limitation may be exceeded provided that the total monthly emissions limitation is not exceeded.
 The annual VOC emissions from the use of adhesive shall not exceed 0.60 TPY from K001 and K002 combined.

The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001, K002, K003, other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, 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.

This assumes that the HAP(s) emitted are the same as the amounts of HAP(s) used, since all HAP(s) used are evaporated.

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the coating, ink and cleanup material usage and emissions limitations and the pursuance of a research program to investigate the use of low VOC coatings.

In accordance with OAC rule 3745-21-09(Y)(2), the requirements of OAC rule 3745-21-09(Y)(1) do not apply to any printing line at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines is less than or equal to 148 tons per year.

B. Operational Restrictions

1. The permittee shall not exceed the following ink, coating and cleanup material usage limits for K001 and K002 combined:
 - a. 350 gallons/month and 4200 gallons/year of water-based coatings and inks, as applied including water;
 - b. 150 gallons/month and 1800 gallons/year of solvent-based coatings and inks;
 - c. 300 gallons/month and 3600 gallons/year of mold inhibitors;
 - d. 30 gallons/month and 366 gallons/year of cleanup materials; and
 - e. 270 gallons/year of adhesive.

The water-based coating and ink usage limitation may be exceeded provided that neither the total monthly emissions limitation nor the combined annual emissions limitation are not exceeded.
2. The permittee shall store all rags used in the cleanup process of this emissions unit in closed containers with tightly fitted covers.
3. The permittee shall initiate and pursue a coating reformulation program to investigate the use of coatings that are lower in VOC content.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for emissions units K001 and K002, combined:
 - 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 total VOC emissions from K001 and K002, in pounds (e. plus f. above).
2. The permittee shall collect and record the following information each month for the emissions units identified in term A.2.c:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. the total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b));
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f));
 - h. the number of gallons of each cleanup material employed;
 - i. 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 (d) for each coating plus the sum of (f) times (h) for each cleanup material);
 - j. the total combined HAP usage from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material);
 - k. the updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceeding eleven calendar months; and
 - l. the updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceeding 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 Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

3. The permittee shall collect and record the total weight in tons of all coatings and inks employed on all flexographic, packaging rotogravure and publication rotogravure printing lines for the purpose of verifying the exemption status identified in term A.2.e.

D. Reporting Requirements

1. The permittee shall submit quarterly reports to the Hamilton County Department of Environmental Services which summarize the actual VOC emissions, in pounds, from the application of water-based inks, solvent-based inks, mold inhibitors, cleanup materials, and adhesives in emissions units K001 and K002 combined. The permittee shall submit such reports by January 31, April 30, July 31 and October 31 of each year for the previous calendar quarter (October through December, January through March, April through June and July through September, respectively).

2. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the rolling, 12-month HAP emission limitations outlined in term and condition A.2.c. The report shall include a copy of each such record along with corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

The permittee shall submit such reports by January 31, April 30, July 31 and October 31 of each year for the previous calendar quarter (October through December, January through March, April through June and July through September, respectively).

3. The permittee shall submit to the Hamilton County Department of Environmental Services an annual report that documents the on-going research and development concerning the coating reformulation program investigating the use of coatings that are lower in VOC content.

The report shall contain at a minimum, any letters from coatings suppliers outlining current efforts, results from any trial coating application and any projected use of an alternative coating. These reports shall be submitted by February 15 of each year.

4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which indicates the permittee exceeded the annual ink usage exemption threshold in term A.2.e. The notification shall include a copy of such record as well as the corrective actions the permittee will take to come into compliance with OAC rule 3745-21-09(Y)(1). The notification shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

E. Testing Requirements

1. Emissions Limitation:

Volatile Organic Compound (VOC) emissions shall not exceed 39.7 lbs per hour.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be demonstrated by either multiplying the actual coating and/or ink material usage rate (gal/hr) by the actual material VOC content (lbs VOC/gal) equalling lbs VOC emissions/hr or by multiplying the actual coating and/or ink material usage rate (lbs/hr) by the actual material VOC content in % by weight equalling lbs VOC emissions/hr.

2. Emissions Limitation:

19.23 TPY VOC emissions from K001 and K002 combined.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation shall be demonstrated by a 12-month summation of the monthly VOC emissions as recorded in term C.1.g.

3. Emissions Limitations:

water-based coatings and inks 330.6 pounds VOC emissions/month
 solvent-based coatings and inks 930.0 pounds VOC emissions/month
 mold inhibitors 1788.0 pounds VOC emissions/month
 cleanup materials 56.0 pounds VOC emissions/month

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitations shall be demonstrated by the recordkeeping requirement in term C.1.e.

4. Emissions Limitation:

0.60 TPY VOC emissions from the use of adhesives in K001 and K002 combined

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be demonstrated by the recordkeeping requirement in term C.1.f.

5. Compliance with the 12-month rolling HAP limitations outlined in term A.2.c shall be demonstrated by the record keeping in section C.2.

6. Compliance with the exemption limitation as outlined in A.2.e shall be demonstrated by the record keeping performed pursuant to section C.3 of this permit.

F. Miscellaneous Requirements

1. None