

Facility ID: 1483040431 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: 1483040431 Emissions Unit ID: K003 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>
K003 - Green Coater - 57 inch Mayer Rod continuous web coater with gas fired flashoff oven	OAC rule 3745-31-05(A)(3)  PTI 14-05210	Volatile organic compound emissions shall not exceed 166.3 lbs/day.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F).  The maximum annual VOC emissions from emissions units K001, K002, and K003 combined shall not exceed 15.21 TPY.  2.9 lbs VOC/gallon of coating, excluding water and exempt solvents (based on a daily volume weighted average).
	OAC rule 3745-21-09(F)	

2. **Additional Terms and Conditions**
  - (a) The daily VOC emission limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with the VOC emissions limit.  
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the daily volume weighted average VOC content limit, compliance with the daily VOC emissions limit, and compliance with the annual combined VOC emissions limit (K001 through K003).

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information on a daily basis:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content, excluding water and exempt solvents, in pounds per gallon of coating for each coating, as applied;
  - c. the number of gallons, excluding water and exempt solvents, of each coating, employed; and
  - d. the daily volume-weighted average VOC content, as applied, for all coatings. The daily volume weighted average shall be calculated by multiplying the VOC content in line (b) by the usage amount contained in line (c) for all coatings employed during that day. The summation of these values should then be divided by the total gallons of coatings employed during that day.
2. The permittee shall collect and record the following information on a monthly basis:
  - a. the name and identification number of each coating and cleanup material, as applied;
  - b. the VOC content, excluding water and exempt solvents, in pounds per gallon for each coating and cleanup material as applied;

- c. the number of gallons, excluding water and exempt solvents, of each coating and cleanup material, employed; and
- d. the actual VOC emissions (Ed) from emissions units K001, K002 and K003 combined, calculated in accordance with the following equation:
- $$Ed = V1C1 + V2C2 + \dots + VnCn$$
- where:
- Ed = actual pounds of VOC emissions for the month from emissions units K001, K002 and K003.  
 C = VOC content of each coating and/or cleanup material employed in emissions units K001, K002 and K003 in pounds of VOC per gallon of coating or cleanup material, excluding water and exempt solvents.  
 V = volume of each coating and/or cleanup material employed for the month in emissions units K001, K002 and K003 in gallons, excluding water and exempt solvents.  
 1,2 = subscript denoting a specific coating or cleanup material employed.  
 n = total number of surface coatings and/or cleanup materials employed in emissions units K001, K002 and K003.

3. The permit to install for the merged emissions from emissions units K001 - K003, 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 the emissions units 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: triethylamine

TLV (ug/m3): 4138.6

Maximum Hourly Emission Rate (lbs/hr): 1.13 (K001 - K003 combined)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 86.76 (K001 - K003 combined)

MAGLC (ug/m3): 98.5

Physical changes to or in the method of operation of the emissions units after 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 units or their 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, 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, 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 units 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 units still satisfy 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 in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation in term A.1. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit and emissions units K001, K002 and K003, combined for the previous calendar year. The reports shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year.

#### E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emissions Limitation:  
Volatile organic compound emissions shall not exceed 166.3 lbs/day.

**Applicable Compliance Method:**

Compliance with the daily VOC emissions limitation in section A.1. shall be demonstrated by multiplying the actual total daily coating usage (gallons/day, as applied) by the actual daily volume-weighted average VOC content (lbs. VOC/gallon, as applied) to yield daily emissions in lbs. VOC/day.

**b. Emissions Limitation:**

The maximum annual VOC emissions from emissions units K001, K002, and K003 combined shall not exceed 15.21 TPY.

**Applicable Compliance Method:**

Compliance with the annual combined VOC emissions limitation for emissions units K001, K002 and K003 shall be demonstrated by the summation of the actual monthly emissions from section C.2.d for each emissions unit and multiplying that summation by 1 ton/2000 lbs.

**c. Emissions Limitation:**

2.9 lbs VOC/gallon of coating, excluding water and exempt solvents (based on a daily volume weighted average).

**Applicable Compliance Method:**

USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 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 24 or 24A.

**F. Miscellaneous Requirements**

1. None