

Facility ID: 1483090119 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: 1483090119 Emissions Unit ID: K007 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>
K007 - 38 inch 2-color flexographic printing press with adhesive applicator for corrugated sheets	OAC rule 3745-31-05(A)(3) PTI 14-05544	1.64 lbs VOC/hr and 7.16 TPY VOC.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a).

OAC rule 3745-21-09(Y)(1)(a)

See term A.2.c.

**2. Additional Terms and Conditions**

- (a) The hourly and annual emissions limitations outlined are based upon the emission unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the coating VOC content restrictions and compliance with the VOC emissions limitations. The VOC content of each coating employed in this emissions unit shall not exceed the following limitations:
  - a. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
  - b. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for emissions unit K007:
  - a. The company name and identification number of each coating, as applied;
  - b. The percent VOC by volume of each coating or ink, excluding water and exempt solvents or the percent VOC by volume of the volatile matter in the coating or ink; and
  - c. The volume, in gallons, of each coating employed.

**D. Reporting Requirements**

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

**E. Testing Requirements**

1. Emissions Limitations
 

1.64 lbs VOC/hr  
7.16 TPY VOC

  - a. Compliance with the hourly VOC emissions limitation shall be determined by multiplying the actual hourly

usage rate of ink (gal/hr) by the actual ink VOC content, as applied (lbs VOC/gal) and the actual hourly usage rate of adhesive (gal/hr) multiplied by the actual adhesive VOC content, as applied (lbs VOC/gal) and adding the results; and

b. Compliance with the annual VOC emissions limitation shall be determined by multiplying the actual annual usage rate of each ink (gal/yr) by the actual ink VOC content, as applied (lbs VOC/gal) of each respective ink, the actual annual usage rate of each adhesive (gal/yr) multiplied by the actual adhesive VOC content, as applied (lbs VOC/gal) of each respective adhesive, and the actual annual usage rate of each cleanup material (gal/yr) multiplied by the actual cleanup material VOC content (lbs VOC/gal) of each respective cleanup material, adding the results and dividing by 2000.

2. Emissions Limitation

Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or  
Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and 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. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees 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 cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions in this permit to install supercede those identified in PTI 14-05250 as issued 2/21/2002.