

Facility ID: 1677011121 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.

[Go to Part II for Emissions Unit K001](#)

[Go to Part II for Emissions Unit K002](#)

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Facility ID: 1677011121 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 - 6 color central impression flexographic printing press	OAC rule 3745-31-05 (PTI 16-02031)	1.82 pounds per hour of VOC 7.98 tons per year of VOC
	OAC rule 3745-21-09(Y)(2)(b)	50.4 pounds per day clean-up solvent emissions 9.2 tons per year of VOC from clean-up solvents This rule is less stringent than the requirements of OAC rule 3745-31-05 and BAT.

See A.2.a. below

2. **Additional Terms and Conditions**
 - (a) The volatile organic compound content of the coatings and inks limitations exempted based on annual facility wide coating usage. The total maximum usage of all coatings and inks in all printing and packaging lines shall not exceed 148 tons per year.

B. Operational Restrictions

1. The permittee shall employ coating and ink formulations, as specified in the permit application, except when a lower VOC, or HAP emitting coating/ink formulations can be employed, provided no violations result of the emission limitations and/or the OEPA "Air Toxics Policy" established in this Permit to Install.
2. The permittee shall employ clean-up solvents, as specified in the permit application, except when a lower VOC, emitting solvent can be employed, provided no violations result of the emission limitations and/or the OEPA "Air Toxics Policy" established in this Permit to Install.
3. The permittee shall employ only clean-up solvents which contain no hazardous air pollutants.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating/ink, and clean-up material as applied;
 - b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents);
 - c. the VOC content in pounds per gallon for each coating, ink and clean-up solvent;
 - d. the total amount of each coating, ink and solvent used, in gallons; and
 - e. the amount of clean-up solvent recovered.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall maintain monthly records of the following information:
 - a. the total number of days, and hours this emissions unit was in operation;
 - b. the VOC emission rate for this emissions unit, in pounds per month (the sum C.1.c. Multiplied by C.1.d) ;
 - c. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per hour (C.2.c divided by C.2.b);
 - d. the average, uncontrolled clean-up solvent emission rate for this emissions unit, in pounds per day (C.2.c divided by C.2.b).
 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where 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 submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 1.82 lbs/hr, and the actual average hourly VOC emissions for each such month.
 2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
 3. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the average clean-up solvent emissions exceeded 50.4 lbs/day, and the actual average daily emissions for each such month.
- E. Testing Requirements**
1. Compliance with the emission limitations and control efficiencies in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

1.82 lbs/hr of VOC

Applicable Compliance Method:

Monthly record keeping as required in sections C.1 and C.2 of the Specific Facility Terms and Conditions for this emissions unit.

Emission Limitation:

7.98 tpy of VOC

Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions section C. of this permit, monthly record keeping of the coating and solvent usage and the VOC content, in weight percent, of each coating and solvent shall be maintained as a demonstration of compliance with this emissions limitation.

Emission Limitation:

50.4 lbs/day of clean-up solvent emissions

Applicable Compliance Method:

Monthly record keeping as required in sections C.1 and C.2 of the Specific Facility Terms and Conditions for this emissions unit.

Emission Limitation:

9.2 tpy of VOC

Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions section C. of this permit, monthly record keeping of the solvent usage and the VOC content, in weight percent, of each coating and solvent shall be maintained as a demonstration of compliance with this emissions limitation.
- F. Miscellaneous Requirements**
1. The permit to install for this emissions unit (K001) 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 this emissions unit 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m3): 1884
 Maximum Hourly Emission Rate (lbs/hr): 0.66
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72
 MAGLC (ug/m3): 44761.9
 Pollutant: Heptane
 TLV (mg/m3): 1639
 Maximum Hourly Emission Rate (lbs/hr): 0.35
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72
 MAGLC (ug/m3): 34285.7

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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 unit or its 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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), 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 (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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Facility ID: 1677011121 Emissions Unit ID: K002 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>
K002 - 6-color central impression flexographic printing press	OAC rule 3745-31-05(A)(3) (PTI 16-02230)	1.95 pounds per hour OC 8.5 tons per year OC
	OAC rule 3745-21-09(Y)(2)(b)	50.4 pounds per day clean-up solvents 9.2 tons per year clean-up solvents This rule is less stringent than the requirements of

OAC rule 3745-31-05 and BAT.

See A.2.a. below

2. Additional Terms and Conditions

- (a) The organic compound content of the coatings and inks limitations exempted based on annual facility wide coating usage. The total maximum usage of all coatings and inks in all printing and packaging lines shall not exceed 148 tons per year.

B. Operational Restrictions

1. The permittee shall employ coating and ink formulations, as specified in the permit application, except when a lower OC, or HAP emitting coating/ink formulations can be employed, provided no violations result of the emission limitations and/or the OEPA "Air Toxics Policy" established in this Permit to Install.
2. The permittee shall employ clean-up solvents, as specified in the permit application, except when a lower OC, emitting solvent can be employed, provided no violations result of the emission limitations and/or the OEPA "Air Toxics Policy" established in this Permit to Install.
3. The permittee shall employ only clean-up solvents which contain no hazardous air pollutants.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating/ink, and clean-up material as applied;
 - b. the OC content in percentage OC by volume of each coating and ink (excluding water and exempt solvents);
 - c. the OC content in pounds per gallon for each coating, ink and clean-up solvent;
 - d. the total amount of each coating, ink and solvent used, in gallons; and
 - e. the amount of clean-up solvent recovered.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. The permittee shall maintain monthly records of the following information:
 - a. the total number of days, and hours this emissions unit was in operation;
 - b. the OC emission rate for this emissions unit, in pounds per month (the sum C.1.c. Multiplied by C.1.d) ;
 - c. the average, uncontrolled OC emission rate for this emissions unit, in pounds per hour (C.2.c divided by C.2.b); and
 - d. the average, uncontrolled clean-up solvent emission rate for this emissions unit, in pounds per day (C.2.c divided by C.2.b).
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where 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 submit deviation (excursion) reports which include an identification of each month during which the OC emissions exceeded 1.82 lbs/hr, and the actual average hourly OC emissions for each such month.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
3. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the average clean-up solvent emissions exceeded 50.4 lbs/day, and the actual average daily emissions for each such month.

E. Testing Requirements

1. Compliance with the emission limitations and control efficiencies in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

1.95 lbs/hr of OC

Applicable Compliance Method:

Monthly record keeping as required in sections C.1 and C.2 of the Specific Facility Terms and Conditions for

this emissions unit.

Emission Limitation:

8.5 tons per year of OC

Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions section C. of this permit, monthly record keeping of the coating and solvent usage and the VOC content, in weight percent, of each coating and solvent shall be maintained as a demonstration of compliance with this emissions limitation.

Emission Limitation:

50.4 lbs/day of clean-up solvent emissions

Applicable Compliance Method:

Monthly record keeping as required in sections C.1 and C.2 of the Specific Facility Terms and Conditions for this emissions unit.

Emission Limitation:

9.2 tons per year of OC from clean-up operations.

Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions section C. of this permit, monthly record keeping of the coating and solvent usage and the VOC content, in weight percent, of each coating and solvent shall be maintained as a demonstration of compliance with this emissions limitation.

F. Miscellaneous Requirements

1. The permit to install for this emissions unit (K002) 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 this emissions unit 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethanol

TLV (mg/m3): 1884

Maximum Hourly Emission Rate (lbs/hr): 0.66

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 44761.9

Pollutant: Heptane

TLV (mg/m3): 1639

Maximum Hourly Emission Rate (lbs/hr): 0.35

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 34285.7

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying 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 unit or its 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 for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), 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 (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.