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Facility Name: **Dopaco, Inc.**

Application Number: **14-4680**

Date: **April 14, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Dopaco, Inc.** located in **Warren** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K010	4-color flexographic printing press	Use of water-based coatings which comply with OAC rule 3745-21-09 (Y) (1) (a) (i); compliance with usage and VOC content limits	3745-21-09 (Y) (1) (a) (i) 3745-31-05 (BAT) 3745-15-07	See Additional Special Term and Condition A.2. 1.0 pounds VOC/hour, 4.12 TPY VOC See Additional Special Terms and Conditions See General Terms

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	Organic Compound
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Tons/Year

4.12

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 250 William Howard Taft Road, Cincinnati, OH 45219-2660.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 250 William Howard Taft Road, Cincinnati, OH 45219-2660.**

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Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

1. For lbs/hr and TPY emissions limitations see the Air Emissions Summary page of this permit.

The hourly emission limitation outlined on the Air Emissions Summary page of this permit is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

2. The VOC content of each ink employed in emissions unit K010 shall not exceed 0.59 pound of VOC per gallon of ink and 40 percent VOC by volume of the ink, excluding water.
3. The VOC content of each cleanup material employed in emissions unit K010 shall not exceed 1.00 pound of VOC per gallon of cleanup material.

B. Operational Restrictions

1. The maximum annual ink usage for emissions unit K010 shall not exceed 13,350 gallons per year.
2. The maximum annual use of cleanup material for emissions unit K010 shall not exceed 1159 gallons per year.
3. To ensure that the evaporative OC/VOC loss from the hand cleanup process does not exceed more than 75 percent (by weight) from solvents having a vapor pressure greater than 10 mmHg (0.19 psia) at 20 degrees Celsius (68 degrees Fahrenheit), all rags utilized in the cleanup process shall be stored in containers with tight fitting covers.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K010:
 - a. the name and identification number of each ink and

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cleanup material employed;

- b. the number of gallons of each ink (including water and exempt solvents), as applied;
- c. the VOC content of each ink in pounds per gallon (including water and exempt solvents), as applied;
- d. the percent VOC by volume of the ink, excluding water;
- e. the number of gallons of each cleanup material employed;
- f. the VOC content of each cleanup material, in pounds per gallon; and,
- g. the total VOC emissions from all inks and cleanup materials employed, in tons [(b x c) + (e x f)].

D. Reporting Requirements

1. The permittee shall notify Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying inks 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.
2. The permittee shall submit annual reports which identify any exceedances of the annual ink and cleanup material usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 30 of each year.
3. Except as otherwise may be provided in reporting requirements for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Hamilton County Dept. of Env. Services; and,
 - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been

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detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Env. Services.

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If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

E. Testing Requirements

1. USEPA methods 24 and 24A shall be used to determine the VOC content for flexographic printing lines and related inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with the VOC emissions limitations on the Air Emissions Summary page of this permit shall be demonstrated by using the following emission factors (EF) where applicable:
 - a. lbs/hr VOC emissions limit - the actual ink usage (gal/hr including water and exempt solvents) multiplied by the actual ink VOC content (lbs VOC/gal including water and exempt solvents) multiplied by the EF from Supplement to OEPA Engineering Guide No. 56 (0.93 lb VOC emitted/lb VOC input) ; and,
 - b. TPY VOC emissions limit - the summation of the actual VOC emissions from all inks [actual gal/yr including water and exempt solvents multiplied by the actual VOC content (lbs VOC/gal) including water and exempt solvents multiplied by the EF (0.93 lb VOC emitted/lb VOC input)]

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the summation of the actual VOC emissions from all cleanup materials [actual gal/yr multiplied by the actual VOC content (lbs VOC/gal) multiplied by the

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EF from Term and Condition B.3. (0.75 lb VOC emitted/lb VOC input)].

3. Compliance with the usage limitations in Additional Special Term and Condition B.1 and B.2 shall be determined by the recordkeeping in Additional Special Term and Condition C.1.

F. Miscellaneous Requirements

1. Pursuant to Engineering Guide No. 69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.