

1

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 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

2

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

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.

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

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.

4

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

5

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

<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 **GBS Printed Products & Systems** located in **Summit** 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.

Ohio EPA Source <u>Number</u>	K007	Source Identification <u>Description</u>	8-color flexographic printing press - Comco Commander
K003	K005	3-color flexographic printing press - 4120 Mark Andy	
	K005 Cont'd		
	P001		7-color flexographic printing press - Comco Cadet I
K004	K006	8-color flexographic printing press - 4150 Mark Andy	
	P001 Cont'd		

Facility Name: **GBS Printed Products & Systems**
Application Number: **16-1868**
Date: **February 24, 1999**

<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>
7-color flexographic printing press - Comco Cadet II				
Plate making machine				

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

<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>
		with the Air Toxics Policy	Compliance with the terms and conditions of this permit	
	<u>BAT Determination</u>			
		Compliance with the Air Toxics Policy		
		Compliance with the Air Toxics Policy		
		Compliance with the Air Toxics Policy	Compliance with the Air Toxics Policy	
		Compliance		

Facility Name: **GBS Printed Products & Systems**
 Application Number: **16-1868**
 Date: **February 24, 1999**

<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>
	Applicable Federal & OAC Rules	3745-21-09 (Y)	3745-21-07 (G) (2)	
3745-31-05		3745-31-05		
3745-21-09 (Y)		3745-21-09 (Y)		
3745-31-05		3745-31-05		
3745-21-09 (Y)		3745-21-09 (Y)		
3745-31-05		3745-31-05		

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

<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>
		pounds/hour OC for coatings		
	Permit Allowable Mass Emissions and/or Control/Usage Requirements	5.3 TPY OC for coatings and cleanup materials	See II.A.1. of the Additional Special Terms and Conditions	
	0.4 pound/hour organic compounds (OC) for coatings	See I.A.1. of the Additional Special Terms and Conditions		
	2.1 TPY OC for coatings and cleanup materials	0.9 pound/hour OC for coatings		
		4.7 TPY OC for coatings and cleanup materials		
	See I.A.1. of the Additional Special Terms and Conditions	See I.A.1. of the Additional Special Terms and Conditions		
	1.0 pounds/hour OC for coatings	0.9 pound/hour OC for coatings		
	5.3 TPY OC for coatings and cleanup materials	4.7 TPY OC for coatings and cleanup materials		
	See I.A.1. of the Additional Special Terms and Conditions	See I.A.1. of the Additional Special Terms and Conditions.		
		1.35 pounds/hour OC		
	1.0	5.9 TPY OC		

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

<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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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	28.0

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 **Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

I. K003, K004, K005, K006, and K007

A. Additional Terms and Conditions

1. The facility is exempt from OAC rule 3745-21-09(Y) because the total maximum usage of coatings for all flexographic printing lines located at the facility is less than or equal to one hundred forty-eight tons per year.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for each emissions unit:
 - a. the name and identification number of each coating;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the amount of each coating employed, in gallons;
 - d. the name and identification number of each thinning solvent;
 - e. the OC content of each thinning solvent, in pounds per gallon;
 - f. the amount of each thinning solvent employed, in gallons;

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

- g. the name and identification of each cleanup material employed;
 - h. the OC content of each cleanup material, in pounds per gallon;
 - i. the amount of each cleanup material employed, in gallons; and,
 - j. the total OC emissions from all coatings, thinning solvents and cleanup materials employed, in tons per month (i.e., the sum of (b) times (c) for each coating plus (e) times (f) for each thinning solvent plus (h) times (i) for each cleanup material, and then divided by 2000 lbs/ton);
2. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the annual OC emission rate, in tons per year, for each emissions unit. The annual reports shall be submitted by January 31 of each year, and shall cover the records for the previous calendar year (January through December).
2. 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 Akron Air Pollution Control; 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 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 Akron Regional Air Pollution Control. 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 31, April 30, July 31, and October 31 of each year and shall cover the

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

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. Compliance with the emission limitation(s) in Air Emission Summary and in the Operational Restrictions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation

0.4 lb/hr OC - K003
1.0 lbs/hr OC - K004
1.0 lbs/hr OC - K005
0.9 lbs/hr OC - K006
0.9 lb/hr OC - K007

Applicable Compliance Method

Multiply the worst-case pounds of OC per gallon of coating, as applied, by the maximum gallons of coating per hour for each emissions unit.

- b. Emission Limitation

2.1 TPY OC - K003
5.3 TPY OC - K004
5.3 TPY OC - K005
4.7 TPY OC - K006
4.7 TPY OC - K007

Applicable Compliance Method

Monthly recordkeeping of the coating, thinning solvent, and cleanup material usage and the OC content of each coating, thinning solvent, and cleanup material.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 4.2

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 9441

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 23,404.76

Pollutant: 1-Methoxy-2-Propanol

TLV (mg/m³): 369

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 2023

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 8785.7

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. 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.
2. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

II. **P001**

A. **Additional Terms and Conditions**

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

1. The emissions limit based on OAC rule 3745-21-07(G)(2) is less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the name and identification number of each solvent;
 - b. the starting inventory of solvent, in gallons;
 - c. the ending inventory of solvent, in gallons;
 - d. the OC content of the solvent, in pounds per gallon;
 - e. the amount of cleanup material employed, in gallons;
 - f. the OC content of the cleanup material, in pounds per gallon; and,
 - g. the amount of OC emitted each month, in tons per month (i.e. , [(b-c) times d]) plus [(e) times (f)], and then divided by 2000).
2. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit annual reports that specify the annual OC emission rate, in tons per year, for this emissions unit. The annual reports shall be submitted by January 31 of each year, and shall cover the records for the previous calendar year (January through December).

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

2. 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 Akron Air Pollution Control; 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 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 Akron Air Pollution Control. 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 31, April 30, July 31, and October 31 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. Compliance with the emission limitation(s) in Air Emission Summary and in the Operational Restrictions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation

1.35 lbs/hr OC

Applicable Compliance Method

Stack testing may be required in the future in accordance with the procedures and test method(s) in OAC rule 3745-21-10(C).
 - b. Emission Limitation

5.9 TPY OC

Applicable Compliance Method

Monthly recordkeeping of the solvent and cleanup material usage and the OC content of the solvent and cleanup material.

18

Facility Name: **GBS Printed Products & Systems**

Application Number: **16-1868**

Date: **February 24, 1999**

F. Miscellaneous Requirements

None.