



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
WARREN COUNTY
Application No: 14-04865**

CERTIFIED MAIL

DATE: 3/15/00

Y	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
Subpart KK	MACT
	NPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Franklin Techpak Inc
Gerald Parish
203 Industrial Drive
Franklin, OH 45005-0000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
KY

HCDES
IN

OH-KY-IN Reg Coun of Govt

**DRAFT PERMIT TO INSTALL 14-04865**

Application Number: 14-04865

APS Premise Number: 1483040357

Permit Fee: **To be entered upon final issuance**

Name of Facility: Franklin Techpak Inc

Person to Contact: Gerald Parish

Address: 203 Industrial Drive
Franklin, OH 45005-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:

**203 Industrial Drive
Franklin, Ohio**

Description of proposed emissions unit(s):

22 inch wide 5 station flexographic press with gas fired dryer.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

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 appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five 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 this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

Issued: To be entered upon final issuance

The proposed emissions unit(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 emissions unit(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 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 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 prove to be inadequate or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. 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.

13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	22.7

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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 - 22 inch wide 5 station flexographic press with gas fired dryer	40 CFR Part 63, Subpart KK OAC rule 3745-31-05(A)(3) OAC rule 3745-21-09(Y)(2)	See term A.2.a. and A.2.c. 71.3 lbs. VOC/hour 3778.2 lbs. VOC/month 22.7 TPY VOC. See term A.2.b., A.2.c., A.2.d. and B.1. Exempt (see term A.2.e.).

2. Additional Terms and Conditions

- 2.a** The permittee commits to and meets the criteria to be considered an area source, and is subject only to the recordkeeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).
- 2.b** The VOC emissions from the use of inks , coatings, and cleanup material in this emissions unit shall not exceed the following:
- i. From water-based coatings and inks, 349.7 pounds per month and 2.1 TPY;
 - ii. From solvent-based coatings and inks, 1441.5 pounds per month and 8.7 TPY;
 - iii. From mold inhibitors, 1752.2 pounds per month and 10.5 TPY;
 - iv. From adhesives, 182.3 pounds per month and 1.1 TPY; and
 - v. From cleanup materials, 52.5 pounds per month and 0.3 TPY.

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Facility ID: 1483040357
Emissions Unit ID: K003

2.c The actual usage* of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

*The usage figures for HAPs shall be adjusted for retention and control efficiency where appropriate.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limitation upon startup of the emissions unit.

2.d The VOC contents of inks, coatings and cleanup material applied in this emissions unit shall not exceed the following:

- i. For water-based coatings and inks, 0.94 pound per gallon, as applied;
- ii. For solvent-based coatings and inks, 6.20 pounds per gallon, as applied;
- iii. For mold inhibitors, 5.96 pounds per gallon, as applied;
- iv. For adhesives, 4.43 pounds per gallon, as applied; and
- v. For cleanup materials, 7.0 pounds per gallon, as applied.

2.e In accordance with OAC rule 3745-21-09(Y)(2), the control requirements of 21-09(Y)(1) do not apply to any printing line at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines is less than or equal to 148 tons per year.

2.f The hourly emission limitations outlined in term A.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.

2.g Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage, VOC content and emissions limitations, compliance with the facility-wide HAPs emissions limits and compliance with the air toxics policy.

B. Operational Restrictions

1. The maximum monthly and annual ink, coating, and cleanup material usage for this emissions unit shall not exceed the following:

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<u>Ink/Coating/Cleanup</u>	<u>Monthly Usage Limit(gallons)</u>	<u>Annual Usage Limit(gallons)</u>
water-based coatings/inks	400	4800
solvent-based coatings/inks	250	3000
mold inhibitor	300	3600
adhesive	42	504
cleanup material	10	120

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification (water-based coating/ink, solvent-based coating/ink, mold inhibitor, adhesive, or cleanup material) of each ink, coating and cleanup material employed;
 - b. The VOC content, in pounds of VOC per gallon, of each ink, coating and cleanup material, as applied;
 - c. The number of gallons of each ink, coating and cleanup material, employed;
 - d. The monthly VOC emissions from each ink, coating and cleanup material, in pounds [the sum of (b) times (c)]; and
 - e. The monthly VOC emissions from all inks, coatings, and cleanup materials, in pounds.

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. The name and identification (water-based coating/ink, solvent-based coating/ink, mold inhibitor, adhesive, or cleanup material) of each ink, coating and cleanup material employed;
 - b. The VOC content, in pounds of VOC per gallon, of each ink, coating and cleanup material, as applied;
 - c. The number of gallons of each ink, coating and cleanup material, employed; and
 - d. The annual VOC emissions from all inks, coatings and cleanup materials, in tons [the sum of (b) times (c) divided by 2000 lbs./ton].

3. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of all inks, coatings and cleanup material, employed;

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Emissions Unit ID: K003

- b. The individual Hazardous Air Pollutant (HAP) content for each HAP of all inks, coatings and cleanup materials in pounds of individual HAP per gallon, as applied;
- c. The total combined HAP content of all inks, coatings and cleanup materials in pounds of combined HAPs per gallon, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of all inks, coatings and cleanup materials employed;
- e. The total individual HAP usage* for each HAP from all inks, coatings and cleanup materials employed, in tons per month [for each HAP the sum of (b) times (d)];
- f. The total combined HAP usage* from all inks, coatings and cleanup materials employed, in tons per month [the sum of (c) times (d)];
- g. The updated rolling, 12-month summation of usage* for each individual HAP emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.; and
- h. The updated rolling, 12-month summation of usage* for total combined HAP emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.

* The usage figures for HAPs shall be adjusted for retention and control efficiency where appropriate.

** A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

- 4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 identify all exceedances of the VOC emissions limitations in terms A.1. and A.2.b. as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.
- 2. The permittee shall submit deviation (excursion) reports which identify any exceedance of the VOC content and/or usage limitations in terms A.2.d. and B.1. as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.
- 3. The permittee shall submit deviation (excursion) reports which identify any exceedance of the HAP emissions limitations set forth in this Permit to Install as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period then a report is required stating so.
- 4. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which indicates the permittee exceeded the annual ink usage exemption threshold in term A.2.e. The notification shall include a copy of such record as well as the corrective actions the permittee will take to come into compliance with OAC rule 3745-21-09(Y)(1). The notification shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
- 5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- 6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

- 1. Compliance with the VOC emissions limitations in section A.2.b. shall be demonstrated by the following methods. The values for solvent retention in the web are referenced in AP-42, Chapter 4.9.1, Page 7, 1981 (reformatted 1995):

Emission Limitations	
water-based inks and coatings	349.7 lbs VOC/month
solvent-based inks and coatings	1441.5 lbs VOC/month
mold inhibitor	1752.2 lbs VOC/month
adhesive	182.3 lbs VOC/month
cleanup material	52.5 lbs VOC/month

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Emissions Unit ID: K003

Applicable Compliance Method

Actual usage (gallons/month) x actual VOC content (lbs VOC/gallon) x 1-retention [1 - (2% for mold inhibitor and adhesive, 7% for inks and coatings)/100] = actual lbs VOC/month

Emission Limitations

water-based inks and coatings	2.1 TPY VOC
solvent-based inks and coatings	8.7 TPY VOC
mold inhibitor	10.5 TPY VOC
adhesive	1.1 TPY VOC
cleanup material	0.3 TPY VOC

Applicable Compliance Method

Actual usage (gallons/year) x actual VOC content (lbs VOC/gallon) x 1-retention [1 - (2% for mold inhibitor and adhesive, 7% for inks and coatings)/100 x 1/2000] = actual TPY VOC

- Compliance with the VOC emissions limitations in section A.1. shall be demonstrated by the following methods:

Emission Limitation

3778.2 lbs/month VOC

Applicable Compliance Method

For each month, the summation of the actual emissions from the water-based inks and coatings, solvent-based inks and coatings, mold inhibitors, adhesives, and cleanup materials, in pounds.

Emission Limitation

22.7 TPY VOC

Applicable Compliance Method

For each calendar year, January through December, the summation of the actual emissions from the water-based inks and coatings, solvent-based inks and coatings, mold inhibitors, adhesives, and cleanup materials, in tons.

- Compliance with the HAPs emissions limitations in section A.2.c. shall be demonstrated by the recordkeeping requirements in section C.3.
- USEPA methods 24 and 24A shall be used to determine the VOC content for inks, flexographic printing lines and related coatings and cleanup materials. 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, coating, or cleanup material the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink, coating, or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
- Compliance with the usage limitations in section B.1. shall be demonstrated by the recordkeeping requirements in section C.1. and C.2.

F. Miscellaneous Requirements

This permit allows the use of materials (inks, coatings, and cleanup 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(A)(3) 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: 2-butoxyethanol (EGBE)

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 34.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,441

MAGLC (ug/m3): 2,880

Pollutant: isopropyl alcohol (IPA)

TLV (ug/m3): 983,000

Maximum Hourly Emission Rate (lbs/hr): 71.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,040

MAGLC (ug/m3): 23,405

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":

- 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

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Facility ID: 1483040357
Emissions Unit ID: K003

Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- 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.

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.

NEW SOURCE REVIEW FORM B

PTI Number: 14-04865

Facility ID: 1483040357

FACILITY NAME Franklin Techpak Inc

FACILITY DESCRIPTION 22 inch wide 5 station flexographic press with gas fired dryer. CITY/TWP Franklin

SIC CODE 2759 SCC CODE 4-05-003-12 EMISSIONS UNIT ID K003

EMISSIONS UNIT DESCRIPTION 22 inch wide 5 station flexographic press with gas fired dryer

DATE INSTALLED Upon receipt of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Primary Non-Attainment	71.3	22.7	71.3 lbs./hour	22.7
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR 63 Subpart PSD? OFFSET POLICY?
 KK

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the usage, VOC content and emissions limitations, compliance with the facility-wide HAPs emissions limits and compliance with the air toxics policy.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$0

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: 2-butoxyethanol, isopropyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 14-04865

Facility ID: 1483040357

FACILITY NAME Franklin Techpak Inc

FACILITY DESCRIPTION	22 inch wide 5 station flexographic press with gas fired dryer.	CITY/TWP	Franklin
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Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

Toxic Screening Analysis

Please provide any additional permit specific notes as you deem necessary:

Permit Review Narrative
PTI 14-04865

Franklin Techpak, Inc.
203 Industrial Drive
Franklin, Ohio 45005

This PTI allows the permittee to install a new 22" wide 5-station flexographic printing press with gas fired dryer (K003). The permittee operates a packaging printing facility in Franklin, Ohio, Warren County. The permittee prints on paper, labels, foil, and tissue for product packaging. The dryer acts as an air dryer to facilitate solvent flash-off. Coating and ink thermosetting does not occur. The emissions from fuel burning are separate from the VOC flash-off emissions.

Applicable rules: 40 CFR 63 Subpart KK, OAC rule 3745-21-09(Y)(2), 31-05(A)(3). Since the permittee applies less than 148 tons per year of inks and coatings from all printing lines at the facility, the permittee complies with the exemption in 21-09(Y)(2). NSPS Subpart RR does not apply since the facility does not apply the adhesive backing on labels. The Subpart KK recordkeeping and reporting requirements only apply to this area source.

Best Available Technology requirements: Compliance with the usage, VOC content and emissions limitations, compliance with the facility-wide HAPs emissions limits and compliance with the air toxics policy.

Emissions: The allowable VOC emissions from K003 are 3778.2 lbs/month and 22.7 TPY. The facility-wide HAP limits are 10 TPY for any single HAP and 25 TPY for total HAPs.

The permittee will maintain monthly usage, VOC content, and VOC /HAPs emissions records in order to comply with the allowable emissions limits. Since the facility Potential to Emit (PTE) VOCs does not exceed 100 TPY, the Title V requirements do not apply to the permittee and this PTI does not require a Synthetic Minor for VOC.

Since the facility-wide PTE HAPs exceeds 10 TPY and 25 TPY, the HAPs limits and recordkeeping/reporting requirements apply. The permittee obtained a Synthetic Minor PTI (14-3878) which restricts the HAPs emissions. Since the PTE HAPs for emissions unit K003 alone does not exceed 10 TPY or 25 TPY, this PTI does not require a Synthetic Minor.

This permit contains air toxic modeling which indicates that the new emissions unit complies with the Ohio EPA Air Toxics Policy.

Recommend direct final approval of this PTI

Permit fee:PWR between 0 lb/hr and 1000 lbs/hr, no adjustments = \$200

Prepared by:Kurt Smith
Date prepared:January 18, 2000

Permit To Install Synthetic Minor Write-Up

NONE

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	22.7