☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install: 14-05844

A. Source Description

The new emissions unit is printing plate developer and the existing unit being modified is an 8-color flexographic printing press at a packaging printing facility.

B. Facility Emissions and Attainment Status

25.13 TPY VOC and 9.9 TPY/25 TPY HAPs emissions from emissions unit K001. The addition of emissions unit P001 will add 8 TPY VOC to the facility's total emissions. The only other emissions unit is a small gas boiler. Warren County is designated non-attainment for ozone.

C. Source Emissions

Since the PTE OC and HAPs emissions from EU K001 exceed the Major Source thresholds, the Part II Terms and Conditions for that EU include Synthetic Minor requirements including a rolling, 12-month inks and coatings usage restriction of 250,000 gallons per year and rolling, 12-month OC (25 TPY) and HAPs (9.9 TPY, 24.9 TPY) emissions limits with the appropriate recordkeeping and reporting requirements.

D. Conclusion

The Synthetic Minor status allows the facility to avoid Non-attainment New Source Review, Title V permitting and MACT Major Source requirements. Since the facility is considered a Synthetic Minor Area Source for 40 CFR 63 Subpart KK applicability, only recordkeeping and reporting requirements apply per that rule.

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: 14-05844
Fac ID: 1483040446

CERTIFIED MAIL

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

DATE: 8/31/2006

Burrows Paper Corporation
Peter Burkdorf
P.O. Box 987 501 West Main Street
Little Falls, NY 133650987

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 of 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 **$400** 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.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **HCDES** **OH-KY-IN Reg Council of Govs** **KY** **IN**

WARREN COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05844** FOR AN AIR CONTAMINANT SOURCE FOR
Burrows Paper Corporation

On 8/31/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Burrows Paper Corporation**, located at **2000 Commerce Center Drive, Franklin**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05844:

Chapter 31 Modification to Fischer and Krecke Press to increase allowable VOC content and the addition of a New Plate Making Process.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy, Cincinnati, OH 45219-2660 [(513)946-7777]

DRAFT PERMIT TO INSTALL 14-05844

Application Number: 14-05844

Facility ID: 1483040446

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

Name of Facility: Burrows Paper Corporation

Person to Contact: Peter Burkdorf

Address: P.O. Box 987 501 West Main Street
Little Falls, NY 133650987

Location of proposed air contaminant source(s) [emissions unit(s)]:
2000 Commerce Center Drive
Franklin, Ohio

Description of proposed emissions unit(s):
Chapter 31 Modification to Fischer and Krecke Press to increase allowable VOC content and the addition of a New Plate Making Process.

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

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)

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 ninety (90) 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

Pollutant	Tons Per Year
VOC	33.13

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.

Operations, Property, and/or Equipment - (K001) - Fischer and Krecke 8-color station flexographic printing press with drying oven

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Emissions of Volatile Organic Compounds (VOC) from the evaporation of solvents from inks and coatings shall not exceed 43.4 lbs/hr. Emissions of VOC from the combustion of natural gas in the drying oven shall not exceed 0.03 lb/hr and 0.13 tons per year (TPY). See terms A.2.a, A.2.b, and B.2. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) Synthetic Minor to Avoid Non-attainment New Source Review, Title V permitting and 40 CFR 63 Subpart KK	Emissions of VOC from the evaporation of solvents from inks and coatings shall not exceed 25.0 TPY based on a rolling, 12-month summation. See terms A.2.c and B.1.
OAC rule 3745-21-09(Y)(1)(a)(ii)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
ORC 3704.03(T)(4)	See term and condition A.2.e.

2. Additional Terms and Conditions

2.a The maximum VOC content of inks and coatings employed in this emissions unit shall not exceed 0.402 lb VOC per gallon of coating, as applied.

2.b The maximum VOC content of inks and coatings employed in this emissions unit shall not exceed 0.20 lb VOC per gallon of ink or coating, as applied, based on a monthly volume weighted average of all inks and coatings employed.

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2.c The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the following emissions units shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs: 21.5 MMBTU/hr Vapor Power natural gas and No. 2 fuel oil boiler (emissions unit B001), Fischer and Krecke 8-color station flexographic printing press with drying oven (emissions unit K001) and DuPont Cyrel Model 3000 printing plate developer, processor and dryer (emissions unit P001). Compliance with the above limitations shall be based on rolling, 12-month summations.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month emission summations upon issuance of this permit.

2.d Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the TPY emission rates, compliance with the rolling, 12-month coating usage, HAP emission limitations and compliance with the VOC content limitations.

2.e The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emission (PE)/particulate matter less than 10 microns in diameter (PM10), sulfur dioxide (SO2), nitrogen oxide (NOx) and carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for these emissions are less than ten tons per year.

2.f The hourly VOC emission limitation of 43.4 lbs/hr is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation.

B. Operational Restrictions

1. The maximum annual ink and coating usage for this emissions unit shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the ink and coating usage figures.

   This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of the ink and coating usage rates, upon issuance of this permit.

2. The permittee shall not employ cleanup materials in this emissions units which contain "organic compounds" as defined by OAC rule 3745-21-01(B)(4).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for emissions unit K001:

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a. the name and identification number of each ink and coating, as applied;

b. the VOC content, in pounds per gallon of coating, for each ink and coating employed;

c. the number of gallons of each ink and coating employed;

d. the monthly volume-weighted average VOC content, as applied, for all inks and coatings, in lbs/gallon. The monthly volume weighted average shall be calculated by multiplying the VOC content in line b by the usage amount contained in line c for all inks and coatings employed during that month. The summation of these values should then be divided by the total gallons of inks and coatings employed during that month;

e. the permittee shall record the rolling, 12-month summation of the ink and coating usage figures;

f. the permittee shall calculate and record the rolling, 12-month summation of the VOC emissions, in tons, from the evaporation of solvent from inks and coatings for each calendar month (e. multiplied by the volume weighted average VOC content as calculated for that month in d. multiplied by 1 ton/2000 lbs); and

g. an identification of each cleanup material which contains an "organic compound," as defined by OAC rule 3745-21-01(B)(4).

2. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.d:

a. the name and identification number of each ink and coating employed;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each ink and coating in pounds of individual HAP per gallon of ink or coating, as applied;

c. the total combined HAP content of each ink and coating in pounds of combined HAP emissions per gallon of ink or coating, as applied (sum all the individual HAP contents from b);

d. the number of gallons of each ink and coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAP content of each cleanup material, in pounds of combined HAP emissions per gallon of cleanup material, as applied (sum all the individual HAP contents from f);

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h. the number of gallons of each cleanup material employed;

i. the type and amount of fuel used in the facility;

j. the calculation of the individual and total HAPs emissions from fuel burning at the facility;

k. the total individual HAP emissions for each HAP, in pounds or tons per month (for each HAP the sum of b. times d. for each ink and coating plus the sum of f. times h. for each cleanup material plus the HAPs from fuel burning);

l. the total combined HAP emissions, in pounds or tons per month (the sum of c. times d. for each ink and coating plus the sum of g. times h. for each cleanup material plus the HAPs from fuel burning);

m. the updated rolling, 12-month summation of usage for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

n. the updated rolling, 12-month summation of usage for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

* 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 individual emissions unit basis.

3. The permit to install for 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 systems, 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: monoethanolamine (CAS 141-43-5)

TLV (ug/m^3):7490

Maximum Hourly Emission Rate (lbs/hr): 8.2 lbs monoethanolamine/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 178.1

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MAGLC (ug/m^3): 178.3

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists’ (ACGIH’s) handbook entitled “TLVs and BEIs” (“Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices”);

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a “modification” under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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 the evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and

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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.

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D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month coating usage and/or VOC emission limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month HAP emission limitations. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents), including the monthly volume weighted average VOC content limit in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

4. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year.

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of a noncomplying cleanup material (i.e., for OC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

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 emissions limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):

   Emissions Limitation:

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43.4 lbs of VOC emissions/hr from the evaporation of solvents from inks and coatings.

Applicable Compliance Method:
Compliance with the hourly VOC emissions limitation shall be demonstrated by multiplying the maximum hourly coating usage rate for the 8-color station press, as applied (gallons/hr) by the maximum VOC content of the coatings, as applied (lbs VOC/gallon) such that the product equals lbs of VOC/hr from the 8-color station press.

Emissions Limitations:
from the combustion of natural gas in the drying oven

0.03 lb/hr VOC; 0.13 TPY VOC.

Applicable Compliance Methods:
Compliance with the emission limitation shall be demonstrated by multiplying the actual drying oven natural gas usage rates (mmBtu/yr) by the emission factors in AP-42, Fifth Edition, Table 1.4-2 revised 7/98 (lbs of pollutant/mmBtu) such that the product equals lbs of VOC/hr; and multiplied by 1 ton/2000 lbs such that the product equals TPY of VOC.

Emissions Limitation:
25.0 TPY of VOC emissions from the evaporation of solvents from inks and coatings based on a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method:
Compliance with the rolling, 12-month VOC emission limitation shall be demonstrated by the record keeping requirement in term C.1.f.

Emissions Limitations:
9.9 TPY for any single HAP and 24.9 TPY for any combination of HAP emissions based on rolling, 12-month summation of HAP emissions.

Applicable Compliance Method:
Compliance with the rolling, 12-month HAP emission limitations shall be demonstrated by the record keeping requirements in term C.2.

Emissions Limitations:
VOC content of inks and coatings shall not exceed 0.402 lb of VOC per gallon of ink or coating, as applied; and
VOC content of inks and coatings employed shall not exceed 0.20 lb of VOC per gallon of inks and coatings, as applied, based on a monthly volume weighted average of all inks and coatings employed.

Applicable Compliance Methods:
Compliance with the VOC content limitations shall be demonstrated by the following:

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a. for the maximum VOC content limit, USEPA methods 24 and 24A shall be used to determine the VOC content for flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A; and

b. for the volume monthly weighted average VOC content limit, compliance shall be demonstrated by the record keeping requirement in term C.1.d.

2. Compliance with the maximum annual ink and coating usage limitation in term and condition B.1 shall be based on the record keeping requirements specified in term and condition C.1.

3. Compliance with the OC content limitation in term and condition B.2 shall be based on the record keeping requirements specified in term and condition C.1.

F. Miscellaneous Requirements

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install 14-05444 issued on October 23, 2003.

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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.

Operations, Property, and/or Equipment - (P001) - DuPont Cyrel Model 3000 printing plate developer, processor and dryer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See term and condition A.2.a.
OAC rule 3745-21-07(G)(2)	See term and condition A.2.b.

2. Additional Terms and Conditions

2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC) emissions from this air contaminant source since the calculated annual emission rate for OC emissions is less than ten tons per year taking into account the federally enforceable rule limitation of "forty pounds of organic material into the atmosphere in any one day" under OAC rule 3745-21-07(G)(2).

2.b A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance used under conditions other than described in paragraph (G)(1) of this rule for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material, unless said discharge has been reduced by at least eighty-five per cent.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the printing plate making operation:

   a. the company identification for each coating and photochemically reactive cleanup material employed;

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b. the number of gallons of each coating and photochemically reactive cleanup material employed;

c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services that include the following information:

   a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

   b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

   If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

E. Testing Requirements

1. Compliance with the emissions limitations in Section A of these terms and conditions shall be determined in accordance with the following method(s):

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Emission Limitations:
8 lbs of VOC emissions/hr and 40 lbs OC emissions/day from the evaporation of solvents from inks and coatings.

Applicable Compliance Method:
Compliance with the OC emission limitations shall be demonstrated by the record keeping specified in term and condition C.1.

The uncontrolled potential to emit OC emissions for this emissions unit is based on the SIP rule based limit under OAC rule 3745-21-07(G)(2):
40 lbs of OC emission/day x 365 days/yr x 1 ton/2000 lbs = 7.3 TPY OC of emissions**.**

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant 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 a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

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