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Facility Name: **Spinnaker Coating**

Application Number: **08-3949**

Date: **February 18, 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.

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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 applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

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BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K010	Flexographic printing press #61	*	3745-31-05 40 CFR Part 63 Subpart KK 3745-21-09 (Y)(1)(a)	16% VOC by volume of the ink, minus water; 1.55 lbs VOC/hour and 6.79 TPY VOC See Additional Special Condition B.1. the limits based on this rule are less stringent than the VOC content limitation established above

* BAT is compliance with the applicable OAC rules and specified allowable mass emission rates; compliance with the requirements of 40 CFR Part 63 Subpart KK; compliance with the VOC content limitation; recordkeeping; and reporting.

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	6.79

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Regional Air Pollution Control Agency, Montgomery County Health Department, 451 West Third Street, P.O. Box 972, Dayton, Ohio 45422.**

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.

AIR POLLUTION NUISANCES PROHIBITED

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

CONSTRUCTION COMPLIANCE CERTIFICATION

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

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Additional Terms and Conditions

1. The 1.55 lbs VOC/hour limitation is being established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum organic HAP employed in this emissions unit on wide web flexographic printing presses for every month shall not exceed 400 kg.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each ink, as applied;
 - b. the percent VOC by volume of each ink, excluding water and exempt solvents, as applied;
 - c. the number of gallons, excluding water and exempt solvents, of each ink employed; and,
 - d. the total VOC emissions from all inks and cleanup materials employed, in pounds or tons.
2. The permittee shall maintain monthly records of the total volume and organic HAP content of each material applied in this emissions unit on wide-web flexographic printing presses.

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D. Reporting Requirements

1. The permittee shall notify the Director (the Regional Air Pollution Control Agency) in writing of any monthly record showing the use of noncomplying coatings in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Regional Air Pollution Control Agency) within 30 days following the end of the month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the monthly organic HAP usage in this emissions unit on wide-web flexographic printing presses.

These quarterly deviation (excursion) reports shall be submitted in the following manner:

- a. reports of any required monitoring and/or record keeping information shall be submitted to the Regional Air Pollution Control Agency; 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 record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventative measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control 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 quarter. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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3. The permittee shall submit to the Regional Air Pollution Control Agency an initial notification report upon startup of this emissions unit that contains the following information:
 - a. the name, title, and address of the owner or operator;
 - b. the address (i.e., physical location) of the emissions unit;
 - c. identification of the applicable emission limitations and compliance date;
 - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and,
 - e. a brief description of each affected emissions unit, including the type of process operation performed.

E. Testing Requirements and Compliance Determinations

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation
16% VOC by volume of the ink, excluding water

Applicable Compliance Method
USEPA Method 24A shall be used to determine the VOC contents for the inks. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures alternative precision statements for Method 24A.

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- b. Emission Limitation
1.55 lbs VOC/hour

Applicable Compliance Method

Compliance shall be determined by multiplying the maximum hourly ink usage by the maximum VOC content of all inks employed in this emissions unit.

- c. Emission Limitation
6.79 TPY VOC

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in C.1. and shall be the sum of the twelve monthly VOC emission rates for the calendar year.