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Facility Name: **Creative Screen Print**

Application Number: **16-1375**

Date: **June 10, 1998**

**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 SOURCE(S)

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 Ohio 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

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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 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.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 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.

#### 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.

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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 made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Creative Screen Print** 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
R001	Screen Printing press no. 1 with a 0.8 MMBtu drying oven	Compliance with the terms and conditions of this permit, and the use of non-photochemically reactive materials.	3745-31-05 3745-21-07 (G) 3745-15-06 3745-15-07	The Combined emissions from this emissions unit and the associated oven shall not exceed 14.5 pounds per hour, 130 pounds per day, and 13.3 tons per year of Organic Compounds.
R002	Screen Printing press no. 2 with a 0.8 MMBtu drying oven	Compliance with the terms and conditions of this permit, and the use of non-photochemically reactive materials.	3745-31-05 3745-21-07 (G) 3745-15-06 3745-15-07	The Combined emissions from this emissions unit and the associated oven shall not exceed 14.5 pounds per hour, 130 pounds per day, and 13.3 tons per year of Organic Compounds.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
R003	Screen Printing press no. 3 with a 0.8 MMBtu drying oven	Compliance with the terms and conditions of this permit, and the use of non-photochemically reactive materials.	3745-31-05 3745-21-07 (G) 3745-15-06 3745-15-07	The Combined emissions from this emissions unit and the associated oven shall not exceed 14.5 pounds per hour, 130 pounds per day, and 13.3 tons per year of Organic Compounds.
R004	Screen Printing press no. 4 with a 0.8 MMBtu drying oven	Compliance with the terms and conditions of this permit, and the use of non-photochemically reactive materials.	3745-31-05 3745-21-07 (G) 3745-15-06 3745-15-07	The Combined emissions from this emissions unit and the associated oven shall not exceed 14.5 pounds per hour, 130 pounds per day, and 13.3 tons per year of Organic Compounds.
R005	Screen Printing press no. 5 with a 0.8 MMBtu drying oven	Compliance with the terms and conditions of this permit, and the use of non-photochemically reactive materials.	3745-31-05 3745-21-07 (G) 3745-15-06 3745-15-07	The Combined emissions from this emissions unit and the associated oven shall not exceed 14.5 pounds per hour, 130 pounds per day, and 13.3 tons per

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
R006	Screen Printing press no. 6 with a 0.8 MMBtu drying oven	Compliance with the terms and conditions of this permit, and the use of non-photochemically reactive materials.	3745-31-05 3745-21-07 (G) 3745-15-06 3745-15-07	year of Organic Compounds.  The Combined emissions from this emissions unit and the associated oven shall not exceed 14.5 pounds per hour, 130 pounds per day, and 13.3 tons per year of Organic Compounds.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Materials*	79.8
Glycol Ethers	19.1

\* Includes individual organic compounds

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Akron Regional Air Quality, 146 South High Street, Room 904, Akron, OH 44308.**

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#### **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, 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 shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

#### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

##### **A. Operational Restrictions/BAT Determination**

1. The permittee shall employ ONLY non-photochemically reactive inks, solvent and cleanup materials. The facility shall limit the ink usage to no more than 3.76 gallons per hour and 2,574 gallons per year per emissions unit. The permittee shall employ only the inks, solvents and clean-up, materials listed in the application for this permit to install.
2. The permittee shall not emit more than 130 pounds of organic compounds in any one day nor more than 14.51 pounds in any one hour per emissions unit.
3. The facility wide use of clean-up material shall not exceed 40.0 gallons of non-photochemically reactive materials per day.

**B. Recordkeeping**

1. The permittee shall collect and record the following information for each day for each coating operation:
  - a. the company identification for each ink, solvent and cleanup material employed;
  - b. the number of gallons of each ink, solvent and cleanup material employed;
  - c. the organic compound content of each ink, solvent and cleanup, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and 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 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.]

2. The permittee shall maintain records all record required by this permit for at least five years.

**C. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for each coating operation which shall include the following information:
  - a. an identification of each day during which the average hourly total organic compound emissions exceeded 14.51 pounds per hour, and the actual average hourly organic compound emissions for each such day;

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- b. an identification of each day during which the total organic compound emissions exceeded 130.0 pounds per day, and the actual organic compound emissions for each such day; and,
  - c. an identification of each day during which photochemically reactive inks, coatings, solvent and/or cleanup materials were used, and the total organic compound emission in pounds per day for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound emissions from all the emissions units contained in this Permit to Install for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 Regional Air Quality; and,
- b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written report 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 Quality. 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

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quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

**D. Compliance Determination**

1. Compliance with the emission limitation(s) in Section A.1. of these Additional Special Terms and Conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

130.0 pounds per day, and 14.51 pounds per hour of organic materials.

Applicable Compliance Method

Daily recordkeeping of coating or ink usage, organic compound content of each coating or ink, and operating hours per day for each unit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and inks.

**E. Ohio Air Toxics Policy**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 16-1375. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the (glycol ether, toluene and methyl ethyl ketone)\* emission limitation(s) specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the screen 3 model and a comparison of the predicted 1 hour

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maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

**Pollutant: 2-Butoxyethanol; Ethylene Glycol Monobutyl Ether (EGBE)\***

TLV (ug/m3): 121

Maximum Hourly Emission Rate (pounds/hour): 10.72

Predicted 1 Hour Maximum Ground-Level Concentration at the Fence Line (ug/m3): 1,075

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2,880.9

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Akron Regional Air Quality Agency are required, including the possible issuance of modifications to PTI number 16-1375:
  - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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;
  - b. any change to the emissions unit or its exhaust parameters (e.g., increase emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
  - c. any change to the emissions unit or its method of operation that would either 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;
  - d. any change in the composition of the coatings or cleanup material, or use of new coatings or cleanup materials, that would result in the emission of any

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of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,

- e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).
- \* (EGBE represents the worse case maximum hourly emission rate of the following pollutants emitted from emissions units R001-R006).

**F. Title V Application**

1. Based on the potential to emit of NO<sub>x</sub>, Organic Compounds and 2-Butoxyethanol (Ethylene Glycol Monobutyl Ether (EGBE)) exceeding the major source cut off limits, this facility is subject to the requirements of Title V of the Clean Air Act of 1990.
2. Within ninety (90) days from the issuance of this permit the permittee, shall have submitted the Title V application to the Ohio EPA Central Office via the Starship program. The permittee shall also submit Title V Fee Emission Reports for 1993, 1994, 1995 and 1996 to the Ohio EPA within ninety days. The Fee emission report for 1997 will be due by April 15, 1998.