John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

12/2/2013

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Robert Zeisler
Graphic Packaging International, Inc.
1171 W Center St
MARION, OH 43302

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0351010062
Permit Number: P0115532
Permit Type: Initial Installation
County: Marion

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO

Response to Comments

Facility ID:	0351010062
Facility Name:	Graphic Packaging International, Inc.
Facility Description:	Commercial Printing, n.e.c
Facility Address:	1171 WEST CENTER ST Marion, OH 43302 Marion County
Permit:	P0115532, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Marion Star on 10/31/2013. The comment period ended on 11/30/2013.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	N/A

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: Typographical comments only.

b. Response: All typos were corrected accordingly.

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Graphic Packaging International, Inc.

Facility ID:	0351010062
Permit Number:	P0115532
Permit Type:	Initial Installation
Issued:	12/2/2013
Effective:	12/2/2013
Expiration:	1/21/2014

Division of Air Pollution Control
Permit-to-Install and Operate
for
Graphic Packaging International, Inc.

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Authorization

Facility ID:	0351010062
Application Number(s):	A0048088
Permit Number:	P0115532
Permit Description:	Installation of new presses, former & gluing machines.
Permit Type:	Initial Installation
Permit Fee:	$800.00
Issue Date:	12/2/2013
Effective Date:	12/2/2013
Expiration Date:	1/21/2014

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Graphic Packaging International, Inc.
1171 WEST CENTER ST
Marion, OH 43302

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0115532
Permit Description: Installation of new presses, former & gluing machines.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**R001**
Company Equipment ID:	Gluing Machines
Superseded Permit Number:	P0108832
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Former Machines
Superseded Permit Number:	P0105786
General Permit Category and Type:	Not Applicable

Group Name: Presses

Emissions Unit ID:	**K013**
Company Equipment ID:	Press 7212
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K014**
Company Equipment ID:	Press 7213
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. “Shut down” means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. R001, Gluing Machines

Operations, Property and/or Equipment Description:

Gluing Machines.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)e. and d)(3)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., b)(2)b., c)(1), d)(1), d)(2), e)(1), f)(1)a. and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined. 3.83 tons volatile organic compounds (VOC) per rolling, 12-month period from adhesives. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/06	See b)(2)d.
d.	OAC rule 3745-21-07(M)	See b)(2)e.
e.	ORC 3704.03(F)	See d)(3)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-114	

(2) Additional Terms and Conditions

a. HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined, shall not exceed 9.9 tons per year forany individual HAP and 24.9 tons per year for any combination of HAPs, basedupon a rolling 12-month summation of the monthly HAP emissions.Compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates. Federallyenforceable HAP limitations are being established for the purposes of avoidingTitle V and Maximum Achievable Control Technology (MACT) applicability.

Rolling emission limitations for individual and combined HAPs were established in Permit to Install and Operate (PTIO) #P0103954, issued on 4/16/09. Since rolling HAP emission records exist from the previously issued PTIO, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

b. This permit establishes the following federally enforceable emission limitation for purposes of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitation is based on the operational restriction contained in c)(1):

3.83 tons VOC per rolling, 12-month period

c. The requirements of this rule are equivalent to the rolling, 12-month VOC emission limitation established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective on November 30, 2001 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the VOC emissions from this air contaminant source since the potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

e. This emissions unit is not subject to the requirements of this rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [See b)(2)b.]:

a. The maximum annual material usage for emissions unit R001 shall not exceed 636,000 lbs for adhesives, based upon a rolling, 12-month summation of the material usage figures.

Rolling emission limitations for annual material usage for adhesives were established in Permit to Install and Operate (PTIO) #P0108832, issued on 2/1/12. Since rolling HAP emission records exist from the previously issued PTIO, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for emissions unit R001 each month:

a. The name and identification number of each adhesive, as applied.

b. The VOC content of each adhesive employed in pounds/pounds of glue, as applied.

c. The number of pounds of each adhesive employed.

d. The rolling, 12-month summation of the monthly adhesive usage rates, in pounds.

e. The amount of VOC emitted from each adhesive employed, in pounds [d)(1)b. x d)(1)c.].

f. The total amount of VOC emitted from all adhesives employed in the gluing machines, in pounds [summation of d)(1)e.].

g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

(2) In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined:

a. The company identification of each ink, coating and adhesive employed.

b. The weight percent of each HAP in each ink, coating and adhesive as applied.

c. The amount of each ink, coating and adhesive employed, in pounds.

d. The emission rate, in pounds, for each HAP from ink, coating and each adhesive employed [d)(2)b. x d)(2)c.]

e. The total emission rate for each HAP from all inks, coatings and adhesives employed [summation of d)(2)d.] for each HAP for all inks coatings and adhesives), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks, coatings and adhesives employed [summation of d)(2)e. for all HAPs], in pounds per month.

g. The annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation, in tons.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

(3) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined);

ii. all exceedances of the rolling, 12-month VOC emission limitation; and

iii. all exceedances of the maximum rolling, 12-month material usage limitation;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

3.83 tons VOC per rolling, 12-month period from adhesives

<u>Applicable Compliance Method:</u>

Compliance with the ton per rolling, 12-month period emission limitation above shall be demonstrated by the record keeping requirements established in section d)(1) of this permit.

b. Emission Limitations:

9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs, for emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002 combined.

Applicable Compliance Method:

Compliance with ton per rolling, 12-month period emission limitations shall be based on the record keeping requirements as specified in section d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.

2. R002, Former Machines

Operations, Property and/or Equipment Description:

Former Machines.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)e. and d)(3)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., b)(2)b., c)(1), d)(1), d)(2), e)(1), f)(1)a. and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002 combined. 0.42 ton volatile organic compounds (VOC) per rolling, 12-month period, from adhesives. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/06	See b)(2)d.
d.	OAC rule 3745-21-07(M)	See b)(2)e.
e.	ORC 3704.03(F)	See d)(3)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-114	

(2) Additional Terms and Conditions

a. HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002 combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions. Federally enforceable HAP limitations are being established for the purposes of avoiding Title V and MACT applicability.

Rolling emission limitations for individual and combined HAPs were established in Permit to Install and Operate (PTIO) #P0105786, issued on 6/10/10. Since rolling HAP emission records exist from the previously issued PTIO, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

b. This permit establishes the following federally enforceable emission limitation for purposes of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitation is based on the operational restriction contained in c)(1):

0.42 ton VOC per rolling, 12-month period

c. The requirements of this rule are equivalent to the rolling, 12-month VOC emission limitation requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective on November 30, 2001 will no longer apply.

d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the VOC emissions from this air contaminant source since the potential to emit (PTE) is less than 10

tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

e. This emissions unit is not subject to the requirements of this rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [See b)(2)b.]:

a. The maximum annual material usage for emissions unit R002 shall not exceed 84,000 lbs for adhesives, based upon a rolling, 12-month summation of the material usage figures.

Rolling emission limitations for annual material usage for adhesives were established in Permit to Install and Operate (PTIO) #P0105786, issued on 6/10/10. Since rolling HAP emission records exist from the previously issued PTIO, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for emissions unit R002 each month:

a. The name and identification number of each adhesive, as applied.

b. The VOC content of each adhesive employed in pounds/pounds of glue, as applied.

c. The number of pounds of each adhesive employed.

d. The rolling, 12-month summation of the monthly adhesive usage rates, in pounds.

e. The amount of VOC emitted from each adhesive employed, in pounds [d)(1)b. x b)(1)c.].

f. The total amount of VOC emitted from all adhesives employed in the gluing machines [summation of d)(1)e.].

g. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

(2) In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined:

a. The company identification of each ink, coating and adhesive employed.

b. The weight percent of each HAP in each ink, coating and adhesive as applied.

c. The amount of each ink, coating and adhesive employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink, coating and adhesive employed [d)(2)b. x d)(2)c.].

e. The total emission rate for each HAP from all inks, coatings and adhesives employed (summation of d)(2)d. for each HAP for all coatings, inks and adhesives), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks, coatings and adhesive employed (summation of d)(2)e. for all HAPs), in pounds per month.

g. The annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation, in tons.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

(3) 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 air compound will be less than 1.0 ton per year. OAC rule 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant, as defined in OAC rule 3745-114-0, to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined);

ii. all exceedances of the rolling, 12-month VOC emission limitation; and

iii. allexceedances the maximum rolling, 12-month material usage restriction.

b. The probable cause of each deviation (excursion);

c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

0.42 ton VOC per rolling, 12-month period

<u>Applicable Compliance Method:</u>

Compliance with the ton per rolling, 12-month emission limitation above shall be demonstrated by the record keeping requirements established in section d)(1) of this permit.

b. <u>Emission Limitations:</u>

9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs, for emission units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined.

<u>Applicable Compliance Method:</u> Compliance with the ton per rolling, 12-month emission limitations above shall be based on the record keeping requirements as specified in section d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Presses: K013,K014,

EU ID	Operations, Property and/or Equipment Description
K013	Flexographic printing press w/ in-line die cutter to produce folded paperboard cartons
K014	Flexographic printing press w/ in-line die cutter to produce folded paperboard cartons

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d. and d)(3)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., b)(2)c., c)(1), d)(1), d)(2), e)(1), f)(1)a., f)(1)b. and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	Hourly volatile organic compounds(VOC) emissions from coatings and inks: For emissions unit K013: 3.36 lbs/hr For emissions unit K014: 3.36 lbs/hr 86.47 tons VOC per rolling, 12-month period (for emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013 and K014 combined) 9.9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission units K004, K005, K006, K008, K009, K010, K011, K012, K013,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		K014R001 and R002, combined. See b)(2)b. and b)(2)c.
c.	OAC rule 3745-21-09(Y)(1)(a)(i)	See b)(2)d.
d.	ORC 3704.03(T) OAC rule3745-114	See d)(3)

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under ORC 3704.03(T) have been determined to be compliance with the VOC emission limitations established pursuant to OAC rule 3745-21-09(Y).

b. This permit establishes the following federally enforceable emission limitation for purposes of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitation is based on the operational restriction contained in c)(1):

86.47 tons VOC per rolling, 12-month period

c. HAP emissions from emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination of HAPs, based upon rolling 12-month summations of the monthly HAP emission rates. Federally enforceable HAP limitations are being established for the purpose of avoiding Title V and MACT applicability.

Rolling emission limitations for individual and combined HAPs were established in Permit to Install and Operate (PTIO) #P0103954, issued on 4/16/09. Since rolling HAP emission records exist from the previously issued PTIO, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d. The VOC content of any coating and/or ink employed flexographically in each emissions unit above shall not exceed the following limitation:

i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or

ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink, as applied.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [See b)(2)b.]:

a. The maximum annual material usage for emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013 and K014, combined shall not exceed 1,089,115 lbs for inks and 4,291,330 lbs for coatings, based upon a rolling, 12-month summation of the material usage figures.

Rolling emission limitations for annual material usage for adhesives were established in Permit to Install and Operate (PTIO) #P0103954, issued on 4/16/09. Since rolling HAP emission records exist from the previously issued PTIO, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for inks and coatings for emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013 and K014, combined:

a. The name and identification number of each coating/ink employed.

b. The VOC content of each coating/ink, in percent VOC by volume of the coating/ink, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for C VOC,5].

c. The VOC content of each coating/ink, in pounds/pounds of ink, as applied.

d. The number of pounds of each coating/ink employed.

e. The rolling, 12-month summation of the monthly inks and coatings usage rates, in pounds.

f. The total VOC emissions from each coating/ink employed, in pounds or tons [d)(1)c.x d)(1)d].

g. The total VOC emissions from all the coatings/inks employed, in pounds or tons (summation of d)(1)f.).

h. The rolling, 12-month summation of the monthly VOC emission rates, in tons.

(2) In order to demonstrate compliance with the annual HAP emission limitations, the permittee shall collect and record the following information each month for emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined:

a. The company identification of each ink, coating and adhesive, employed.

b. The weight percent of each HAP in each ink, coating and adhesive, as applied.

c. The amount of each ink, coating and adhesive employed, in pounds.

d. The emission rate, in pounds, for each HAP from each ink, coating and adhesive, employed [d)(2)b.x b)(2)c].

e. The total emission rate for each HAP from all inks, coatings and adhesives employed (summation of d)(2)d. for each HAP for all coatings, inks and adhesives), in pounds per month.

f. The total HAP emission rate for the combination of all HAPs from all inks, coatings and adhesives employed (summation of d)(2)e. for all HAPs), in pounds per month.

g. The annual emissions of each individual HAP and the combined HAPs, based upon a rolling 12-month summation, in tons.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

(3) 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 compound will be less than 1.0 ton per year. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations and operational restrictions in this permit:

i. All exceedances of the rolling, 12-month VOC emission limitation of 86.47 tons;

ii. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons of and 24.9 tons, respectively (from emissions units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002 combined); and

iii. All exceedances of rolling, 12-month material usage limitations of:

(a) For inks: 1,089,115 pounds; and

(b) For coatings: 4,291,330 pounds.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings/inks (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>
For Emissions unit K013: 3.36 lbs/hr

For Emissions unit K014: 3.36 lbs/hr

<u>Applicable Compliance Method:</u> The hourly VOC emission limitations above are based on each emissions unit's potential to emit*, therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with the emission limitations above.

*The potential to emit for each emissions unit was determined (as demonstrated below) by multiplying the maximum material paperboard processing rate and a maximum VOC content:

For emissions unit K013:

(24.2 lbs/hr)(0.08)= 1.94 lbs VOC/hr inks

(70.9 lbs/hr)(0.02)= 1.42 lbs/hr coatings

For emissions unit K014:

(24.2 lbs/hr)(0.08)= 1.94 lbs VOC/hr inks

(70.9 lbs/hr)(0.02)= 1.42 lbs VOC/hr coatings

If required, the permittee shall demonstrate compliance with the hourly emission limitations by testing in accordance with Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

b. Emission Limitation: 86.47 tons VOC per rolling, 12-month period, for emissions unit's K004, K005, K006, K008, K009, K010, K011 K012, K013 and K014, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in section d)(1) of this permit.

c. Emission Limitation: 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for combined HAPs, for emission units K004, K005, K006, K008, K009, K010, K011, K012, K013, K014, R001 and R002, combined.

Applicable Compliance Method: Compliance shall be based on the record keeping requirements as specified in section d)(2) of this permit.

d. Emission Limitation: VOC content of each coating and ink not to exceed 40 percent VOC, by volume, of the coating and ink, excluding water and exempt solvents, as applied.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the coatings/inks.

g) Miscellaneous Requirements

(1) None.