

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **08-04703**

**A. Source Description**

Weyerhaeuser Company, a container board packaging facility, is located in Preble County. Weyerhaeuser is proposing a modification to its existing air permit-to-install (PTI), the installation of two new emission units and wants to limit the Volatile Organic Compound (VOC). Therefore, through the limitations on the VOC emissions from a combination of inks, coatings, adhesives and cleanup materials, they will be a synthetic minor facility and avoid Title V permitting.

**B. Facility Emissions and Attainment Status**

Weyerhaeuser is currently classified as a minor stationary source pursuant to Title V operating permit requirements for VOC. Preble County is currently designated as attainment for ozone.

**C. Source Emissions**

Potential emissions of VOC from this facility, without any federally enforceable restrictions is 459.29 tons per year. Limiting the annual VOC emissions from a combination of inks, coatings, adhesives and cleanup materials will limit the VOC emissions to 29.0 tons per rolling, 12-month summation. Therefore the allowable emissions of VOC from this facility is 46.17 tons per year [synthetic minor limit of 29.0 tons VOC/yr (K001, K005, K006, K007, K008 and K009) + 17.17 tons/yr (P002)].

**D. Conclusion**

Weyerhaeuser will become a synthetic minor facility by limiting the annual VOC emissions from a combination of inks, coatings, adhesives and cleanup materials effectively restricting the facility potential to emit (PTE) for VOC to below Title V operating permit threshold levels. Monthly monitoring, record keeping and calculations, along with quarterly deviation reports from emission units K001, K005, K006, K007, K008 and K009, will be required to monitor compliance. Therefore, through federally enforceable terms and conditions and record keeping requirements, Weyerhaeuser will not trigger the Title V permitting requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
PREBLE COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 08-04703**

**Fac ID: 0868030047**

**DATE: 8/23/2005**

Weyerhaeuser Co  
Brent Dixon  
900 State Rte 35 West  
Eaton, OH 45320-0240

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1800** 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

RAPCA

Toledo Metro Area Council of Gov.

KY

IN

**PREBLE COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04703 FOR AN AIR CONTAMINANT SOURCE FOR  
Weyerhaeuser Co**

On 8/23/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Weyerhaeuser Co**, located at **900 State Rte 35 West, Eaton**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04703:

**Facility applying for SMTV status and installing two new sun auto flexo folder gluers.**

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.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280  
[(937)225-4435]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 08-04703**

Application Number: 08-04703  
Facility ID: 0868030047  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Weyerhaeuser Co  
Person to Contact: Brent Dixon  
Address: 900 State Rte 35 West  
Eaton, OH 45320-0240

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**900 State Rte 35 West  
Eaton, Ohio**

Description of proposed emissions unit(s):  
**Facility applying for SMTV status and installing two new sun auto flexo folder gluers.**

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

Weyerhaeuser Co

Facility ID: 0868030047

PTI Application: 08-04703

Issued: To be entered upon final issuance

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,

**Weyerhaeuser Co****Facility ID: 0868030047****PTI Application: 08-04703****Issued: To be entered upon final issuance**

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

**Weyerhaeuser Co**

**Facility ID: 0868030047**

**PTI Application: 08-04703**

**Issued: To be entered upon final issuance**

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

Weyerhaeuser Co

Facility ID: 0868030047

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
Volatile Organic Compound	46.17
particulate	14.69
Individual HAP	8.0
Combined HAPs	10.0

Weyerhaeuser Co  
PTI Application: 08-04702  
Issue

Facility ID: 0868030047

Emissions Unit ID: K001

**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, <u>and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V permitting requirements)
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K001 - 2424 United Rotary Die Cutter	OAC rule 3745-31-05(A)(3)
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Modification  
See F.2

**Weyerhaeuser Co**  
**PTI Application: 08-04702**  
**Issue:**

**Facility ID: 0868030047**

**Emissions Unit ID: K001**

Applicable Emissions  
Limitations/Control Measures

The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 19.87 lbs/hr.

The VOC emissions from this emissions unit shall not exceed 5 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(2)(b) and OAC rule 3745-35-07(B).

The Hazardous Air Pollutants (HAPs) emissions from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs.

(See A.2.c.)

See A.2.b.

The VOC emission rate from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials.

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The 19.87 lbs VOC/hr emission limitation was established for PTI purposes 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 limitation.
- 2.b** The requirements of OAC rule 3745-21-09(Y)(1) shall not apply provided the total maximum usage of coating and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility is less than or equal to one hundred forty-eight tons per year.
- 2.c** The permittee has requested annual emissions limitations upon HAPs be established in this PTI to reflect the source's potential to emit (PTE), which is federally enforceable. The individual and combined HAPs limitations are based upon the PTE of the emissions units at the facility. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

**B. Operational Restrictions**

- 1. The maximum annual volatile organic material usage for emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of inks, additives and cleanup materials.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation for the facility.

**C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall collect and record the following information each month on a facility-wide basis for emissions units K001, K005, K006, K007, K008 and K009:
  - a. The name and identification number of each ink, additive and cleanup material employed.
  - b. The weight, in pound per month, of each ink, additive and cleanup material employed, as applied.

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- c. The VOC content of each ink, additive and cleanup material, as applied, in percent by weight.
- d. The total volatile organic material usage and VOC emissions from all inks, additives and cleanup materials in pounds [summation of (b x c) for all inks + summation of (b x c) for all additives + summation of (b x c) for all cleanup materials].
- e. The rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, additives and cleanup materials.

**D. Reporting Requirements**

1. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 5.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
  - b. An identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceeded the 29.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
3. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

**E. Testing Requirements**

Emissions Unit ID: **K001**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission limitation:  
19.87 lbs VOC/hr from a combination of inks, additives and cleanup materials  
  
Applicable Compliance Method:  
This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly inks, additives and cleanup usage rate times the maximum VOC contents (percent by weight).
  - b. Emission limitation:  
5.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.  
  
Applicable Compliance Method:  
Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.
  - c. Emission limitation:  
29.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation from emission units K001, K005, K006, K007, K008, and K009.  
  
Applicable Compliance Method:  
Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.
  - d. Emission limitations:  
8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs from emission units K001, K005, K006, K007, K008, and K009.  
  
Applicable Compliance Method:  
The tons/yr limitations were developed by multiplying the short term PTE by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided that the short term PTE does not change, compliance with the annual PTE is assured.

## **F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A, B, C, D and E.
2. Terms in this permit supercede those identified in PTI 08-04256 issued 07/03/2001 and represents an increase of 1.96 tons VOC/yr.

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**Weye**

**PTI A**

**Issued: To be entered upon final issuance**

Emissions Unit ID: **K001**

**Weye  
PTI A**

Emissions Unit ID: **K005**

**Issued: To be entered upon final issuance**

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K005 - 2434 Renew Ward Rotary Die cutter	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(Y)(2)(b)  OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V permitting requirements)
Modification See F.2		

**Weye**

**PTI A**

Emissions Unit ID: **K005**

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control Measures

summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials.

The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 16.99 lbs/hr.

The VOC emissions from this emissions unit shall not exceed 5 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(2)(b) and OAC rule 3745-35-07(B).

The Hazardous Air Pollutants (HAPs) emissions from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs.  
(See A.2.c.)

See A.2.b.

The VOC emission rate from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons/yr, based upon a rolling, 12-month

Emissions Unit ID: K005

## 2. Additional Terms and Conditions

- 2.a** The 16.99 lbs VOC/hr emission limitation was established for PTI purposes 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 limitation.
- 2.b** The requirements of OAC rule 3745-21-09(Y)(1) shall not apply provided the total maximum usage of coating and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility is less than or equal to one hundred forty-eight tons per year.
- 2.c** The permittee has requested annual emissions limitations upon HAPs be established in this PTI to reflect the source's potential to emit (PTE), which is federally enforceable. The individual and combined HAPs limitations are based upon the PTE of the emissions units at the facility. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

## B. Operational Restrictions

1. The maximum annual volatile organic material usage for emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of inks, additives and cleanup materials.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation for the facility.

## C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month on a facility-wide basis for emissions units K001, K005, K006, K007, K008 and K009:
- a. The name and identification number of each ink, additive and cleanup material employed.
- b. The weight, in pound per month, of each ink, additive and cleanup material employed, as applied.

**Issued: To be entered upon final issuance**

- c. The VOC content of each ink, additive and cleanup material, as applied, in percent by weight.
- d. The total volatile organic material usage and VOC emissions from all inks, additives and cleanup materials in pounds [summation of (b x c) for all inks + summation of (b x c) for all additives + summation of (b x c) for all cleanup materials].
- e. The rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, additives and cleanup materials.

**D. Reporting Requirements**

1. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 5.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
  - b. An identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceeded the 29.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
3. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

**E. Testing Requirements**

Emissions Unit ID: **K005**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:  
16.99 lbs VOC/hr from a combination of inks, additives and cleanup materials

Applicable Compliance Method:

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly inks, additives and cleanup usage rate times the maximum VOC contents (percent by weight).

- b. Emission limitation:  
5.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.

- c. Emission limitation:  
29.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.

- d. Emission limitations:  
8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs from emission units K001, K005, K006, K007, K008, and K009.

Applicable Compliance Method:

The tons/yr limitations were developed by multiplying the short term PTE by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided that the short term PTE does not change, compliance with the annual PTE is assured.

## **F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A, B, C, D and E.

**Weye**

**PTI A**

Emissions Unit ID: **K005**

**Issued: To be entered upon final issuance**

2. Terms in this permit supercede those identified in PTI 08-04256 issued 07/03/2001 and represents an increase of 1.3 tons VOC/yr.

**Weye  
PTI A**

Emissions Unit ID: **K006**

**Issued: To be entered upon final issuance**

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K006 - 2444 Ward Rotary Die Cutter	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(Y)(2)(b)  OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V permitting requirements)
Modification See F.2		

**Weye****PTI A**Emissions Unit ID: **K006****Issued: To be entered upon final issuance**Applicable Emissions  
Limitations/Control Measures

emissions from a combination of inks, additives and cleanup materials.

The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 13.59 lbs/hr.

The VOC emissions from this emissions unit shall not exceed 4 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(2)(b) and OAC rule 3745-35-07(B).

The Hazardous Air Pollutants (HAPs) emissions from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs.

(See A.2.c.)

See A.2.b.

The VOC emission rate from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The 13.59 lbs VOC/hr emission limitation was established for PTI purposes 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 limitation.
- 2.b** The requirements of OAC rule 3745-21-09(Y)(1) shall not apply provided the total maximum usage of coating and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility is less than or equal to one hundred forty-eight tons per year.
- 2.c** The permittee has requested annual emissions limitations upon HAPs be established in this PTI to reflect the source's potential to emit (PTE), which is federally enforceable. The individual and combined HAPs limitations are based upon the PTE of the emissions units at the facility. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of inks, additives and cleanup materials.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation for the facility.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month on a facility-wide basis for emissions units K001, K005, K006, K007, K008 and K009:
- a. The name and identification number of each ink, additive and cleanup material employed.
- b. The weight, in pound per month, of each ink, additive and cleanup material employed, as applied.

- c. The VOC content of each ink, additive and cleanup material, as applied, in percent by weight.
- d. The total volatile organic material usage and VOC emissions from all inks, additives and cleanup materials in pounds [summation of (b x c) for all inks + summation of (b x c) for all additives + summation of (b x c) for all cleanup materials].
- e. The rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, additives and cleanup materials.

#### **D. Reporting Requirements**

1. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 5.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
  - b. An identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceeded the 29.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
3. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

#### **E. Testing Requirements**

**Issued: To be entered upon final issuance**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:
  - a. Emission limitation:  
13.59 lbs VOC/hr from a combination of inks, additives and cleanup materials  
  
Applicable Compliance Method:  
This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly inks, additives and cleanup usage rate times the maximum VOC contents (percent by weight).
  - b. Emission limitation:  
4.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.  
  
Applicable Compliance Method:  
Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.
  - c. Emission limitation:  
29.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.  
  
Applicable Compliance Method:  
Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.
  - d. Emission limitations:  
8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs from emission units K001, K005, K006, K007, K008, and K009.  
  
Applicable Compliance Method:  
The tons/yr limitations were developed by multiplying the short term PTE by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided that the short term PTE does not change, compliance with the annual PTE is assured.

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A, B, C, D and E.

**Weyerhaeuser Co**  
**PTI Application: 08-04702**  
**Issue**

**Facility ID: 0868030047**

**Emissions Unit ID: K006**

2. Terms in this permit supercede those identified in PTI 08-04256 issued 07/03/2001 and represents a decrease of 0.07 ton VOC/yr.

**Weye  
PTI A**

Emissions Unit ID: **K007**

**Issued: To be entered upon final issuance**

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K007 - 2494 Titan Rotary Die Cutter	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(Y)(2)(b)
Modification See F.2		OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V permitting requirements)

**Weye**

**PTI A**

Emissions Unit ID: **K007**

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control Measures

emissions from a combination of inks, additives and cleanup materials.

The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 17.67 lbs/hr.

The VOC emissions from this emissions unit shall not exceed 5 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(2)(b) and OAC rule 3745-35-07(B).

The Hazardous Air Pollutants (HAPs) emissions from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs.  
(See A.2.c.)

See A.2.b.

The VOC emission rate from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The 17.67 lbs/hr emission limitation was established for PTI purposes 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 limitation.
- 2.b** The requirements of OAC rule 3745-21-09(Y)(1) shall not apply provided the total maximum usage of coating and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility is less than or equal to one hundred forty-eight tons per year.
- 2.c** The permittee has requested annual emissions limitations upon HAPs be established in this PTI to reflect the source's potential to emit (PTE), which is federally enforceable. The individual and combined HAPs limitations are based upon the PTE of the emissions units at the facility. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of inks, additives and cleanup materials.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation for the facility.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month on a facility-wide basis for emissions units K001, K005, K006, K007, K008 and K009:
- a. The name and identification number of each ink, additive and cleanup material employed.
- b. The weight, in pound per month, of each ink, additive and cleanup material employed, as applied.

- c. The VOC content of each ink, additive and cleanup material, as applied, in percent by weight.
- d. The total volatile organic material usage and VOC emissions from all inks, additives and cleanup materials in pounds [summation of (b x c) for all inks + summation of (b x c) for all additives + summation of (b x c) for all cleanup materials].
- e. The rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, additives and cleanup materials.

#### **D. Reporting Requirements**

1. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 5.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
  - b. An identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceeded the 29.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
3. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

#### **E. Testing Requirements**

**Issued: To be entered upon final issuance**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:  
17.67 lbs VOC/hr from a combination of inks, additives and cleanup materials

**Applicable Compliance Method:**

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly inks, additives and cleanup usage rate times the maximum VOC contents (percent by weight).

- b. Emission limitation:  
5.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

**Applicable Compliance Method:**

Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.

- c. Emission limitation:  
29.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

**Applicable Compliance Method:**

Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.

- d. Emission limitations:  
8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs from emission units K001, K005, K006, K007, K008, and K009.

**Applicable Compliance Method:**

The tons/yr limitations were developed by multiplying the short term PTE by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided that the short term PTE does not change, compliance with the annual PTE is assured.

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A, B, C, D and E.

**Weyerhaeuser Co**  
**PTI Application: 08-04702**  
**Issue**

**Facility ID: 0868030047**

**Emissions Unit ID: K007**

2. Terms in this permit supercede those identified in PTI 08-04256 issued 07/03/2001 and represents an increase of 0.40 ton VOC/yr.

**Weye  
PTI A**

Emissions Unit ID: **K008**

**Issued: To be entered upon final issuance**

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K008 - 5126 Sun auto Flexo Folder Gluer	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(Y)(2)(b)  OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V permitting requirements)

**Weye  
PTI A**

Emissions Unit ID: **K008**

**Issued: To be entered upon final issuance**

Applicable Emissions  
Limitations/Control Measures

emissions from a combination of inks, additives and cleanup materials.

The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 14.68 lbs/hr.

The VOC emissions from this emissions unit shall not exceed 4 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(2)(b) and OAC rule 3745-35-07(B).

The Hazardous Air Pollutants (HAPs) emissions from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs.  
(See A.2.c.)

See A.2.b.

The VOC emission rate from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The 14.68 lbs/hr emission limitation was established for PTI purposes 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 limitation.
- 2.b** The requirements of OAC rule 3745-21-09(Y)(1) shall not apply provided the total maximum usage of coating and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility is less than or equal to one hundred forty-eight tons per year.
- 2.c** The permittee has requested annual emissions limitations upon HAPs be established in this PTI to reflect the source's potential to emit (PTE), which is federally enforceable. The individual and combined HAPs limitations are based upon the PTE of the emissions units at the facility. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

**B. Operational Restrictions**

- 1. The maximum annual volatile organic material usage for emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of inks, additives and cleanup materials.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation for the facility.

**C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall collect and record the following information each month on a facility-wide basis for emissions units K001, K005, K006, K007, K008 and K009:
  - a. The name and identification number of each ink, additive and cleanup material employed.
  - b. The weight, in pound per month, of each ink, additive and cleanup material employed, as applied.

- c. The VOC content of each ink, additive and cleanup material, as applied, in percent by weight.
- d. The total volatile organic material usage and VOC emissions from all inks, additives and cleanup materials in pounds [summation of (b x c) for all inks + summation of (b x c) for all additives + summation of (b x c) for all cleanup materials].
- e. The rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, additives and cleanup materials.

#### **D. Reporting Requirements**

1. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 5.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
  - b. An identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceeded the 29.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
3. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

#### **E. Testing Requirements**

**Issued: To be entered upon final issuance**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:  
14.68 lbs VOC/hr from a combination of inks, additives and cleanup materials

**Applicable Compliance Method:**

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly inks, additives and cleanup usage rate times the maximum VOC contents (percent by weight).

- b. Emission limitation:  
4.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

**Applicable Compliance Method:**

Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.

- c. Emission limitation:  
29.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

**Applicable Compliance Method:**

Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.

- d. Emission limitations:  
8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs from emission units K001, K005, K006, K007, K008, and K009.

**Applicable Compliance Method:**

The tons/yr limitations were developed by multiplying the short term PTE by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided that the short term PTE does not change, compliance with the annual PTE is assured.

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A, B, C, D and E.

**Weye  
PTI A**

Emissions Unit ID: **K009**

**Issued: To be entered upon final issuance**

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K009 - 5136 Sun Auto Flexo Folder Gluer	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(Y)(2)(b)  OAC rule 3745-35-07(B) (Synthetic minor to avoid Title V permitting requirements)

**Weyerhaeuser Co****PTI Application: 08-04702****Issue:****Facility ID: 0868030047****Emissions Unit ID: K009**

Applicable Emissions  
Limitations/Control Measures

The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 16.36 lbs/hr.

The VOC emissions from this emissions unit shall not exceed 5 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions from a combination of inks, additives and cleanup materials.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(2)(b) and OAC rule 3745-35-07(B).

The Hazardous Air Pollutants (HAPs) emissions from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs.

(See A.2.c.)

See A.2.b.

The VOC emission rate from emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC

emissions from a combination of inks, additives and cleanup materials.

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The 16.36 lbs VOC/hr emission limitation was established for PTI purposes 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 limitation.
- 2.b** The requirements of OAC rule 3745-21-09(Y)(1) shall not apply provided the total maximum usage of coating and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility is less than or equal to one hundred forty-eight tons per year.
- 2.c** The permittee has requested annual emissions limitations upon HAPs be established in this PTI to reflect the source's potential to emit (PTE), which is federally enforceable. The individual and combined HAPs limitations are based upon the PTE of the emissions units at the facility. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for emission units K001, K005, K006, K007, K008, and K009 shall not exceed 29.0 tons per year, based upon a rolling, 12-month summation of the monthly volatile organic material usage figures from a combination of inks, additives and cleanup materials.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual volatile organic material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month summation for the facility.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month on a facility-wide basis for emissions units K001, K005, K006, K007, K008 and K009:
- a. The name and identification number of each ink, additive and cleanup material employed.
- b. The weight, in pound per month, of each ink, additive and cleanup material employed, as applied.

**Issued: To be entered upon final issuance**

- c. The VOC content of each ink, additive and cleanup material, as applied, in percent by weight.
- d. The total volatile organic material usage and VOC emissions from all inks, additives and cleanup materials in pounds [summation of (b x c) for all inks + summation of (b x c) for all additives + summation of (b x c) for all cleanup materials].
- e. The rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, additives and cleanup materials.

**D. Reporting Requirements**

1. The permittee shall submit annual reports that specify the total actual annual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following:
  - a. An identification of each month during which the rolling, 12-month VOC emissions exceeded the 5.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
  - b. An identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceeded the 29.0 tons per year rolling 12-month emission limitation, and the actual rolling, 12 month VOC emissions for each such month.
3. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

**E. Testing Requirements**

Emissions Unit ID: **K009**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:  
16.36 lbs VOC/hr from a combination of inks, additives and cleanup materials

Applicable Compliance Method:

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly inks, additives and cleanup usage rate times the maximum VOC contents (percent by weight).

- b. Emission limitation:  
5.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.

- c. Emission limitation:  
29.0 tons VOC/yr from a combination of inks, additives and cleanup materials as a 12-month rolling summation.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be based on the record keeping requirements specified in section C.1.

- d. Emission limitations:  
8.0 tons/yr for any individual HAP and 10.0 tons/yr for any combination of HAPs from emission units K001, K005, K006, K007, K008, and K009.

Applicable Compliance Method:

The tons/yr limitations were developed by multiplying the short term PTE by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided that the short term PTE does not change, compliance with the annual PTE is assured.

## F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A, B, C, D and E.

**Weye  
PTI A**

Emissions Unit ID: **P002**

**Issued: To be entered upon final issuance**

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - corrugator; 490 thousand square feet (msf) per hour	OAC rule 3745-31-05(A)(3)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 3.92 lbs/hr and 17.17 tons/yr.
Modification See F.1.	OAC rule 3745-21-09(F)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F).  See A.2.b.

**2. Additional Terms and Conditions**

- 2.a The hourly and annual emission limitations were established for PTI purposes to reflect 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.
- 2.b The maximum VOC content shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for P002:
  - a. The name and identification of each component of the glue mix, as applied.
  - b. The VOC content of each component of the glue mix (excluding water and exempt solvents), as applied.
  - c. The production rate in thousand square feet (msf).
  - d. The total VOC emissions from all components, in pounds or tons per month.

#### **D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. 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 organic containing materials. 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.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
3.92 lbs VOC/hr  
  
Applicable Compliance Method:  
Compliance shall be determined by multiplying the maximum production rate of 490 msf/hr by a company derived production usage factor of 0.008 lb/msf.
  - b. Emission Limitation:  
17.17 tons VOC/yr  
  
Applicable Compliance Method:  
The annual mass emissions limitation of 17.17 tons/yr was developed by

**Weye****PTI A**Emissions Unit ID: **P002****Issued: To be entered upon final issuance**

multiplying the maximum hourly emission rate of 3.92 lbs/hr by the maximum operating schedule of 8760 hrs/yr and dividing by 2,000 lbs/ton.

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

**Weye**

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**F. Miscellaneous Requirements**

1. Terms in this permit supercede those identified in PTI 08-04191 issued 09/06/2000 and represents an increase of 4.99 tons VOC/yr.

**Weye  
PTI A**

Emissions Unit ID: **P003**

**Issued: To be entered upon final issuance**

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Scrap Paper Handling System Cyclone	OAC rule 3745-31-05(A)(3)	The particulate emissions (PE) from this unit shall not exceed 3.33 lbs/hr and 14.60 tons/yr.
	OAC rule 3745-17-11(B)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The emissions limitation specified this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).  Except as provided by rule, visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average.

**2. Additional Terms and Conditions**

- 2.a The hourly and annual emission limitations were established for PTI purposes 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 these limits.

**Weye****PTI A**Emissions Unit ID: **P003****Issued: To be entered upon final issuance****B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

None

**D. Reporting Requirements**

1. The permittee shall submit annual reports that specify the total actual annual particulate emissions, from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:  
3.33 lbs PE/hr

Applicable Compliance Method:

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum hourly waste generated (tons/hr) by an emissions factor of 0.791 lb PE/ton (based on stack testing at a similar facility).

- b. Emission limitation:  
14.60 tons PE/yr

Applicable Compliance Method:

The annual mass emissions limitation of 14.60 was developed by multiplying the maximum hourly emissions rate of 3.33 lbs PE/hr by the maximum operating schedule of 8,760 hrs/yr and dividing by 2000 lbs/ton.

- c. Emission limitation:  
Except as provided by rule, visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average

Applicable Compliance Method:

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If required, compliance shall be determined through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1)

**F. Miscellaneous Requirements**

None

**Weye****PTI A**Emissions Unit ID: **P004****Issued: To be entered upon final issuance****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P004 - Starch Silo with fabric filter baghouse	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(B)
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-08(B)	

**Weye****PTI A**Emissions Unit ID: **P004****Issued: To be entered upon final issuance**Applicable Emissions  
Limitations/Control Measures

The particulate emissions (PE) from this unit shall not exceed 0.02 lb/hr and 0.09 ton/yr.

The silo shall be adequately enclosed and vented to the fabric filter; the enclosure shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture.

The fabric filter shall achieve an outlet emissions rate of not greater than 0.020 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent.

(See Sections A.2.c through A.2.e)

There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period.

The emissions limitation specified this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emissions limitation

specified this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

Except as provided by rule, visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average.

The emissions limitation specified this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

**2.a** The hourly and annual emission limitations were established for PTI purposes 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 these limits.

**2.b** The material handling operation that is covered by this permit and subject to the above-mentioned requirements is listed below:

Starch Storage Silo

**2.c** The permittee shall employ best available control measures for the above identified material handling operations for the purpose of ensuring compliance with the above mentioned applicable requirements. In accordance with the permitte's permit application, the permittee has committed to perform the following control measure to ensure compliance:

Material Handling OperationControl Measure

Starch Storage Silo

Fabric Filters

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.d** For each material handling operation that is not adequately enclosed, the above identified control measure shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure is necessary to ensure compliance with the above mentioned applicable requirements. Any required implementation of the control measure shall continue during the operation of the material handling operation until further observation confirms that use of the control measure is unnecessary.

**2.e** Implementation of the above mentioned control measure in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3).

**B. Operational Restrictions**

None

### C. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>Material Handling Operation</u>	<u>Minimum Inspection Frequency</u>
Starch Storage Silo	Daily

2. The above mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure;
  - c. the dates the control measure(s) was (were) implemented; and
  - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

### D. Reporting Requirements

1. The permittee shall submit annual reports that specify the total actual annual particulate emissions, from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be

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satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

2. The permittee shall submit semiannual reports which (a) identify all days during which any abnormal visible visible fugitive particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions. These reports shall be submitted to the Director of the Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

**E. Testing Requirements**

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

- a. Emission limitation:  
0.02 lb PE/hr

**Applicable Compliance Method:**

This emission limitation is based upon the unit's potential to emit, which is determined by multiplying the maximum amount of starch delivered (lbs/delivery) by the emission factor that is provided and derived from AP-42 11.12-4, Table 11.12-2 (03/04), multiplying by control efficiency and dividing by the number of hours per delivery.

- b. Emission Limitation:  
0.02 gr/dscf

**Applicable Compliance Method:**

If required, compliance shall be based upon stack testing per OAC rule 3745-17-03(B)(10).

- c. Emission limitation:  
0.09 ton PE/yr

**Applicable Compliance Method:**

The annual mass emissions limitation of 0.09 ton was developed by multiplying the maximum hourly emissions rate of 0.02 lb PE/hr by the maximum operating schedule of 8,760 hrs/yr and dividing by 2000 lbs/ton.

**Weyerhaeuser Co**  
**PTI Application: 08-04702**  
**Issue**

**Facility ID: 0868030047**

**Emissions Unit ID: P004**

- d. **Emission Limitation:**  
There shall be no visible PE except for a period of time not to exceed one minute in any 60-minute observation period.

**Applicable Compliance Method:**  
Compliance with the visible PE limitations for the starch silo identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

**F. Miscellaneous Requirements**

None