



State of Ohio Environmental Protection Agency

P.O. Box 163669, 1800 WaterMark Dr.
Columbus, Ohio 43216-3669
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Re: Permit to Install
Noble County
Application No: 06-4083
SYNTHETIC MINOR

CERTIFIED MAIL

November 30, 1994

INTERNATIONAL CONVERTER, INC.
JEFF D'COSTA
17153 CO. RD. 57
CALDWELL, OH 43724

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 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. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
SOUTHEAST DISTRICT OFFICE, DAPC



Printed on recycled paper

EPA 1613 (rev 5/94)



Permit to Install Terms and Conditions

Application No. 06-4083
APS Premise No. 0661000027
Permit Fee: \$1400.00

Name of Facility: INTERNATIONAL CONVERTER, INC.

Person to Contact: JEFF D'COSTA

Address: 17153 CO. RD. 57
CALDWELL, OH 43724

Location of proposed source(s): 17153 CO. RD. 57
CALDWELL, OHIO

Description of proposed source(s):
PTI MODIFICATION FOR LAMINATORS 1, 2, & 3 INSTALLATION OF LA
MINATORS 4, 5 & FLEXOGRAPHIC PRINTING LINES 1 & 2.

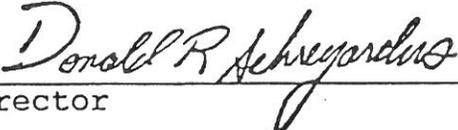
Date of Issuance: November 30, 1994

Effective Date: November 30, 1994

The above named entity is hereby granted a permit to install for the above described source(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 source(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 source(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

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. 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

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installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

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

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SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

AIR EMISSION SUMMARY

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001	#1 Laminator	See attached terms and conditions.	3745-31-05 3745-21-09 (Y)	See additional terms and conditions. Maximum hourly emissions of VOC shall be limited to 6.25 lbs.
K002	#2 Laminator	See attached terms and conditions.	3745-31-05 3745-21-09 (Y)	See additional terms and conditions. Maximum hourly emissions of VOC shall be limited to 37.5 lbs.
K003	#3 Laminator	See attached terms and conditions.	3745-31-05 3745-21-09 (Y)	See additional terms and conditions. Maximum hourly emissions of VOC shall be limited to 75 lbs.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K004	#4 Laminator	See additional terms and conditions.	3745-21-09 (Y)	See additional terms and conditions. Maximum hourly emissions of VOC shall be limited to 62.5 lbs.
K005	#5 Laminator	See additional terms and conditions.	3745-31-05 3745-21-09 (Y)	See additional terms and conditions. Maximum hourly emissions of VOC shall be limited to 62.5 lbs.
K006	#1 Flexo-graphic Printing Press	See additional terms and conditions.	3745-31-05 3745-21-09 (Y)(1)	See additional terms and conditions. Maximum hourly emissions of VOC shall be limited to 0.75 lbs.
K007	#2 Flexo-graphic Printing Press	See additional terms and conditions.	3745-31-05 3745-21-09 (Y)(1)	See additional terms and conditions. Maximum hourly emissions of VOC shall be limited to 0.75 lbs.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/year</u>
VOC	249.00 (Based on a rolling 12 month calculation for all sources and this facility)

CONSTRUCTION STATUS

The OEPA Southeast District Office - DAPC shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: K004 Laminator #4 and K005 laminator #5, K006 Flexographic Printing Line #1 and K007 Flexographic Printing #2.

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

Source

All

Pollutants

VOC

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Southeast District Office - DAPC, 2195 Front Street, Logan, Ohio 43138.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Southeast District Office - DAPC, 2195 Front Street, Logan, Ohio 43138.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

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

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. This Permit to Install supersedes PTI 06-907 for the three aluminum foil laminators. PTI 06-907 is still valid for the 2.2 MM Btu/hr gas boiler only.

2. Best Available Technology and Control Requirements:

These sources shall be vented to a catalytic incinerator at all times coatings and inks are in use that contain more than 1.14 pound of VOC per gallon. The overall control efficiency (the product of the capture efficiency of the control system multiplied by the destruction of the incinerator) shall equal or exceed seventy-five percent (75%) at all times.

The catalytic incinerator shall operate up to 8000 scfm and 25% of the LEL (lower explosive limit) of the gas stream. If the gas stream to the catalytic incinerator exceeds 25% of the LEL, the lines controlled by the catalytic incinerator shall be automatically shut down based on excessive temperature in the incinerator.

Operational requirements for this facility are:

- a. Any existing or later developed floor sweep from this line shall be ducted to the catalytic incinerator for destruction.
- b. All dampers that may direct VOC laden gas streams to the ambient air shall be equipped with positive seal gaskets.

3. Monitoring Requirements:

Monitoring equipment shall be installed and maintained to continuously monitor and record the temperature (in degrees fahrenheit) of the catalytic incinerator bed (average bed temperature) and also the exhaust gases immediately exiting the incinerator catalyst bed. Catalytic incinerator bed temperature shall be maintained at 700°F minimum. Anytime the bed temperature drops below 700°F, while using VOC based coatings, the instance shall be reported to the Ohio EPA in accordance with malfunction reporting requirements.

Copies of the temperature recording charts shall be kept by International Converter, Inc., for three (3) years and shall be made available to Ohio Environmental Protection Agency for review at any time requested in writing or in person during inspection of the facility.

4. Record-keeping and Reporting requirements for Surface Coating or Printing Lines:

The facility shall maintain monthly records which list the following information for each surface coating or ink employed in these sources:

- a. the company identification of the surface coating;
- b. the number of gallons employed;
- c. the VOC content, in pounds of VOC per gallon of coating;
- d. the VOC content, in pounds of VOC per gallon of coating, excluding water;
- e. the nonvolatile (solids) content, in percent by volume;
- f. the total VOC and organic compound emissions (including cleanup emissions) for the calendar month, in pounds;
- g. the total rolling, 12 month VOC emissions (including cleanup emissions) as of the last day of the calendar month, in pounds; and
- h. indication of whether or not emissions were routed to the control device.

These monthly records, as well as any supporting coating or ink analyses and computations, shall be retained in the company's files for period of not less than two years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

This facility shall submit quarterly reports which summarize all the above-mentioned information for the previous three calendar months. The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

These quarterly reports shall also summarize the emissions from these sources during the previous three calendar months and during the previous three 12-month periods. Compliance with the annual emission limit shall be based on rolling monthly calculations.

Total VOC facility emissions shall be determined monthly for the proceeding 11 months and the current month. Total VOC facility emissions shall indicate both waterborne and solvent based coatings.

5. The annual emissions from this source shall be limited to 249.00 tons per year. To accomplish this, International Converter shall limit coating usage such that the annual VOC emissions from the coatings applied is no more than 249.00 tons per rolling period based on a 75% destruction efficiency of the catalytic incinerator and the use of water-borne coatings. In order to ensure federal enforceability during the first 12 months of operation International Converter shall

not exceed the following cumulative monthly usage restrictions:

<u>Month</u>	<u>Tons of VOC (applied)</u>
1	30.00
1 & 2	60.00
1 - 3	90.00
1 - 4	110.75
1 - 5	131.50
1 - 6	152.25
1 - 7	173.00
1 - 8	193.25
1 - 9	214.50
1 - 10	226.00
1 - 11	237.50
1 - 12	249.00

*Based upon VOC content and amount of coatings. Thereafter, International Converter shall recalculate monthly the annual VOC content of the coatings applied. Each month shall start a new 12-month period.

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APS Premise No. 0661000027
Permit Fee: \$1400

Name of Facility: INTERNATIONAL CONVERTER, INC.

Person to Contact: JEFF D'COSTA

Address: 17153 COUNTY ROAD 57
CALDWELL, OH 43724

Location of proposed source(s): 17153 COUNTY ROAD 57
CALDWELL, OH 43729

Description of proposed source(s):
MODIFICATION FOR LAMINATORS #1, #2, & #3; INSTALLATION OF
LAMINATORS #4 & #5 AND FLEXOGRAPHIC PRINTING LINES #1 AND #2

Date of Issuance:

Effective Date:

The above named entity is hereby granted a permit to install for the above described source(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 source(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 source(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

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TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rules 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

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prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

AIR EMISSION SUMMARY

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

Ohio EPA Source No.	Source Identification/Description	BAT Determination	Applicable Federal and OAC Rules	Permit Allowable Mass Emissions and/or Control & Usage Requirements
K001	#1 Laminator	See attached terms and conditions.	3745-31-05 3745-21-09 (Y)	See additional terms and conditions.
K002	#2 Laminator	See attached terms and conditions.	3745-31-05 3745-21-09 (Y)	See additional terms and conditions.
K003	#3 Laminator	See attached terms and conditions.	3745-31-05 3745-21-09 (Y)	See additional terms and conditions.
K004	#4 Laminator	See additional terms and conditions	3745-21-09 (Y)	See additional terms and conditions
K005	#5 Laminator	See additional terms and conditions	3745-31-05 3745-21-09 (Y)	See additional terms and conditions

K006	#1 Flexo- graphic Print- ing Press	See additional 3745-31-05 terms and con- ditions	See additional 21-09(Y)(1) terms and conditions
K007	#2 Flexo- graphic Print- ing Press	See additional 3745-31-05 terms and con- ditions	See additional 21-09(Y)(1) terms and conditions

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	249.00 (Based on a rolling 12 month calculator for all sources and this facility)

CONSTRUCTION STATUS

The Southeast District Office shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: K004 Liminator #4 and K005 Laminator #5, K006 Flexographic Printing Line #1 and K007 Flexographic Printing Line #2.

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit applicaiton was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

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- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutant(s):

<u>Sources</u>	<u>Pollutant(s)</u>
K004 & K005	VOC

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than two years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to the Southeast District Office, Division of Air Pollution Control, 2195 Front Street, Logan, Ohio 43138.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Southeast District Office - DAPC, 2195 Front Street, Logan, Ohio 43138.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the

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August 8, 1994

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

AIR POLLUTION NUISANCES PROHIBITED

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. This Permit to Install supersedes PTI 06-907 for the three aluminum foil laminators. PTI 06-907 is still valid for the 2.2 MM Btu/hr gas boiler only.

2. Best Available Technology and Control Requirements:

These sources shall be vented to a catalytic incinerator at all times coatings and inks are in use that contain more than 1.14 pound of VOC per gallon. The overall control efficiency (the product of the capture efficiency of the control system multiplied by the destruction of the incinerator) shall equal or exceed seventy-five percent (75%) at all times.

The catalytic incinerator shall operate up to 8000 scfm and 25% of the LEL (lower explosive limit) of the gas stream. If the gas stream to the catalytic incinerator exceeds 25% of the LEL, the lines controlled by the catalytic incinerator shall be automatically shut down based on excessive temperature in the incinerator.

Operational requirements for this facility are:

- a. Any existing or later developed floor sweep from this line shall be ducted to the catalytic incinerator for destruction.
 - b. All dampers that may direct VOC laden gas streams to the ambient air shall be equipped with positive seal gaskets.
3. Monitoring Requirements:

Monitoring equipment shall be installed and maintained to continuously monitor and record the temperature (in degrees Fahrenheit) of the catalytic incinerator bed (average bed temperature) and also the exhaust gases immediately exiting the incinerator catalyst bed. Catalytic incinerator bed temperature shall be maintained at 700°F minimum. Anytime the bed temperature drops below 700°F, while using VOC based coatings, the instance shall be reported to the Ohio EPA in accordance with malfunction reporting requirements.

Copies of the temperature recording charts shall be kept by International Converter, Inc., for three (3) years and shall be made available to Ohio Environmental Protection Agency for review at any time requested in writing or in person during inspection of the facility.

4. Record-keeping and Reporting Requirements for Surface Coating or Printing Lines:

The facility shall maintain monthly records which list the following information for each surface coating or ink employed in these sources:

- (a) the company identification of the surface coating;
- (b) the number of gallons employed;
- (c) the VOC content, in pounds of VOC per gallon of coating;
- (d) the VOC content, in pounds of VOC per gallon of coating, excluding water;
- (e) the nonvolatile (solids) content, in percent by volume.
- (f) the total VOC and organic compound emissions (including cleanup emissions) for the calendar month, in pounds; and
- (g) the total rolling, 12-month VOC emissions (including cleanup emissions) as of the last day of the calendar month, in pounds.
- (h) indication of whether or not emissions were routed to the control device.

These monthly records, as well as any supporting coating or ink analyses and computations, shall be retained in the company's files for a period of not less than two years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

This facility shall submit quarterly reports which summarize all of the above-mentioned information for the previous three calendar months. The reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

These quarterly reports shall also summarize the emissions from these sources during the previous three calendar months and during the previous three 12-month periods. Compliance with the annual emission limit shall be based on rolling monthly calculations.

Total VOC facility emissions shall be determined monthly for the preceeding 11 months and the current month. Total VOC facility emissions shall indicate both waterborne and solvent based coatings.

AIR EMISSION SUMMARY

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

<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
K004	#4 Laminator	See Additional Terms and Conditions	3745-31-05 3745-21-09(Y)	See Additional Terms and Conditions
K005	#5 Laminator	See Additional Terms and Conditions	3745-31-05 3745-21-09(Y)	See Additional Terms and Conditions

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	249.00 Facility Cap

PERMIT TO INSTALL DISTRIBUTION SHEET
INDICATE BELOW TO WHOM COPIES ARE TO BE SENT

Applicant's Mailing Address	PERMIT	REPORT	PLANS	DATA SHEETS
JEFF D'COSTA PERSON TO CONTACT INTERNATIONAL CONVERTER, INC. APPLICANT	X			
17153 COUNTY ROAD 57 STREET				
CALDWELL OH 43724 CITY STATE ZIP				
Copy to:	X			
Copy To:	X			
Copy To:	X			
Copy To:	X			
Local Air Agency _____	X			
District Office NEDO ___ NWDO ___ CDO ___ SEDO <u>X</u> SWDO ___	X			
Central Office DAPC <u>X</u> DWPC ___ DLPC ___ DHMM ___	X			

9. CONSTRUCTION STATUS: Unknown Not started Partially Completed Completed
NEW SOURCES Modified Sou
10. DATE CONSTRUCTION TO BEGIN: NA NEW SOURCES Construction Pending PFI Issuance
11. ESTIMATED COST OF WASTE TREATMENT FACILITY PROJECT: _____

NOTE: ATTACH INSTALLATION SCHEDULE TO THIS WORKSHEET FOR AIR POLLUTION SOURCES.

12. DO/LAA Engr. Review By: DANIEL J. CANTER Date 3/22/94
13. Review approved:  Date 3-22-94
14. D.O. Review as Required: _____ Date _____
15. Central Office Review: _____ Date _____
16. For any Combined Permits:
- AIR REVIEW (DO/LAA) _____ Date _____
- WASTEWATER REVIEW _____ Date _____
- SOLID WASTE REVIEW _____ Date _____
- HAZARDOUS WASTE REVIEW _____ Date _____

FOR DENIALS ONLY

RULES IN VIOLATION: _____

SPECIFIC REASONS FOR DENIAL: _____

CENTRAL OFFICE USE ONLY

Issuance Date: _____

Effective Date: _____

APS Premise No. 0661000027

PTI Application No. 06-4083

Fee \$1400

PERMIT TO INSTALL WORKSHEET

1. TYPE OF SOURCE: Check as applicable:

AIR - Major Source? YES NO - Was a New Source Review Data Sheet (for modeling) submitted to APC for this source? YES NO

NSPS Category _____ PSD CEM NESHAPS Category _____ Emission Offsets

WATER - Pertains to Sewers Wastewater Treatment Industrial Facility

SOLID WASTE

HAZARDOUS WASTE DISPOSAL FACILITY - Is a HWFAB Permit required? YES NO

2. Check one: APPROVAL DENIAL

3. FACILITY NAME: INTERNATIONAL CONVERTER, INC.

4. APPLICANT/PERSON TO CONTACT MR. JEFF D'COSTA PHONE (614) 732-7515

5. MAILING ADDRESS: (Street) 17153 COUNTY ROAD 57
(City) CALDWELL (State) OHIO (Zip) 43724

6. LOCATION OF PROPOSED SOURCE: Always complete b (city or township) and c (county).

a. Specific Street Address or Location Description 17153 COUNTY ROAD 57

b. City/Township CALDWELL

c. County/Counties NOBLE

d. Sewer District, if applicable NA

7. DESCRIPTION OF PROPOSED SOURCE (Max. 120 characters)

P	T	I		M	O	D	I	F	I	C	A	T	I	O	N		F	O	R		L	A	M	I	N	A	T	O	R	S		1	,	2	,	&	3		
I	N	S	T	A	L	L	A	T	I	O	N		O	F		L	A	M	I	N	A	T	O	R	S		4	,	5		&		F		L	E	X	O	G
R	A	P	H	I	C		P	R	I	N	T	I	N	G		L	I	N	E	S		1	&	2															

8. DATE COMPLETE APPLICATION RECEIVED: JULY 27, 1994

Recommendation for Modification of Permit to Operate/Variance

TO: Division of Authorization & Compliance, Office of Air Pollution Control

FROM: DAN CANTER AND FRED KLINGELHAFFER
(individual)

SEDO
(local agency/district office)

Date: 3/22/94

1. Application Number: 0661000027 K001, K002, K003 Current Type: PTO/Variance
(circle one)
2. Has a Notification Form (RA) been forwarded to the Div. of A & C? Yes No
(The "RA" form enters "Receipt of Modification Application"; it does not generate a Public Notice)
3. Type of modification under consideration:
 - a. Special Terms & Conditions (other than Compliance Time Schedule) Add Modify Delete
 - b. Compliance Time Schedule
 - Addition to PTO/Variance
 - Extension of final compliance date
 - Change in interim date(s)
 - Change in method of compliance
 - c. Other (describe) CHANGE EQUIPMENT DESCRIPTION ON K003 ONLY.
5. Is this source a major polluter: Yes No
6. DO/LAA Recommendation: Approval Denial
7. Person to contact: JEFF D'COSTA
8. Facility Name: INTERNATIONAL CONVERTER, INC.
9. Facility mailing address: 17153 COUNTY ROAD 57
CALDWELL, OH 43724

Required Attachments: One (1) copy of revised compliance time schedule
 (as applicable) One (1) copy of compliance time schedule to be added
 One (1) copy of revised special terms and conditions
 One (1) copy of special terms and conditions to be added

Reasons for the Approval or Denial of the Application for Modification:

TO CLARIFY ALLOWABLE ANNUAL VOC EMISSION RATE.

Signature of the person recommending modification

Date _____

Signature of the DO Air Section Chief/
LAA Director/Designee

Date _____

DO Sign-off for a LAA if source is a Major Polluter

Date _____

ENGINEERING REVIEW FORM

HYDROCARBON EMITTING SOURCE

(other than fuel burning equipment/incinerator)

- (1) Facility name: International Converter
- (2) Description of source: 3 Laminators 1, 2, & 3
- (3) Year installed: 1976 Year modified: 1983
- (4) Permit application number: 0661000027 K001, K002, K003
- (5) Most recent permit action (complete below):

Type of permit: PTD
 Status: A
 Effective date: 11/3/93 Expiration date: 11/30/95

- (6) Identify regulation(s) governing this source and briefly describe pertinent requirements and exemptions.

OAC 3745-31-05(A)(3)
OAC 3745-21-09 (V)

- (7) Describe current control equipment or control measures.

Catalytic Incinerator
demonstrated 81% Control 11/19/91 Stack Test

- (8) If source is on a compliance schedule, describe control strategy and indicate date of final compliance.

NA

- (9) If source is governed by a mass emission rate or percent control requirement, provide estimate of actual mass emission rate or percent control and state basis for estimate.

249.00 TPY For Facility
Calculations provided by RMT Consulting w/ Application

- (10) Date of last emissions test: 10/19/91
 Describe test and source operation during test:

Method 25 Conducted for K001-K003

- (11) Date of last inspection: 7/12/93

- (12) Describe any recorded violation and enforcement action or warning for the past three years. If enforcement action or warning was issued, describe results.

NA

- (13) Is source under permit review? Yes Type of permit: PTI Pending

- (14) Comments: This PTI App supersedes 06-907 for K001-K003

- (15) Name of person completing form: Daniel J. Carter

PTI NO. 06-4083 PREMISE NO. 0661000027
 FACILITY NAME International Converter, Inc. COUNTY Noble
 FACILITY DESCRIPTION Paper/Foil Laminating CITY/TWP Caldwell
 SIC CODE 3497 SCC CODE _____
 SOURCE DESCRIPTION Flexographic, packaging, rotogravure printing lines, aluminum foil / kraft paper wet laminator
 START-UP DATE 11/84

EMISSIONS:

Pollutants	Air Quality Designation	Actual Emissions		PTI Allowable Emissions	
		lb/hr, etc.	TPY	lb/hr, etc.	TPY
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					249.00
Nitrogen Oxides	Attainment				
Carbon Monoxide					
Lead	Attainment				
Other: Air Toxics (see other side)	Unclassified				

APPLICABLE FEDERAL RULES: _____ NSPS _____ NESHAP _____ PSD _____ OFFSET POLICY

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
249.00 TPY VOC emission cap computed on a 12 month rolling average. Cap based on 1987 agreement between EPA and previous facility owner

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$200,000

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____ YES X _____ NO
 (If yes, turn to other side and complete "Toxic Air Contaminants" Section)

PERSON COMPLETING FORM David J. Coate DATE 3/22/94

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

WAS AIR TOXICS MODELING PERFORMED*? YES NO

*IF YES, ATTACHED MODELING RESULTS IF NO, ATTACH NEW SOURCE CODING FORM

IDENTIFY AIR CONTAMINANTS: _____

ENGINEERING REVIEW FORM

HYDROCARBON EMITTING SOURCE

(other than fuel burning equipment/incinerator)

- (1) Facility name: International Converter Inc
- (2) Description of source: Flexographic laminator lines #1 & #2
- (3) Year installed: 1994 Year modified:
- (4) Permit application number: 0661000027
- (5) Most recent permit action (complete below):

Type of permit: PTI
Status: Pending
Effective date: Expiration date:

- (6) Identify regulation(s) governing this source and briefly describe pertinent requirements and exemptions. 3745-21-09 (4) (1)

- (7) Describe current control equipment or control measures. Water-borne coating

- (8) If source is on a compliance schedule, describe control strategy and indicate date of final compliance.

- (9) If source is governed by a mass emission rate or percent control requirement, provide estimate of actual mass emission rate or percent control and state basis for estimate.

- (10) Date of last emissions test:
Describe test and source operation during test:

- (11) Date of last inspection:

- (12) Describe any recorded violation and enforcement action or warning for the past three years. If enforcement action or warning was issued, describe results.

- (13) Is source under permit review? Yes Type of permit: PTI

- (14) Comments: Facility Cap 249 TPY VOC

- (15) Name of person completing form: Daniel J. Cantu

ENGINEERING REVIEW FORM

HYDROCARBON EMITTING SOURCE

(other than fuel burning equipment/incinerator)

- (1) Facility name: International Converter
- (2) Description of source: Laminator #4+5
- (3) Year installed: 1994 Year modified: NA
- (4) Permit application number: D661000027 K004, K005
- (5) Most recent permit action (complete below):

Type of permit: PTI
Status: A Pending
Effective date: NA Expiration date: NA

- (6) Identify regulation(s) governing this source and briefly describe pertinent requirements and exemptions.

DAC 3745-31-05 (A) (3)
3748-21-09 (Y)

- (7) Describe current control equipment or control measures.

Catalytic Incinerator

- (8) If source is on a compliance schedule, describe control strategy and indicate date of final compliance.

NA

- (9) If source is governed by a mass emission rate or percent control requirement, provide estimate of actual mass emission rate or percent control and state basis for estimate.

249.00 TPY Facility Cap

- (10) Date of last emissions test: 11/17/91
Describe test and source operation during test:

Method 25

- (11) Date of last inspection: 7/12/93

- (12) Describe any recorded violation and enforcement action or warning for the past three years. If enforcement action or warning was issued, describe results.

NA

- (13) Is source under permit review? Yes Type of permit: PTI Pending

- (14) Comments:

- (15) Name of person completing form: Daniel J. Cante

PTI NO. DB-4083 PREMISE NO. 0661000027
 FACILITY NAME International Converter COUNTY Doble
 FACILITY DESCRIPTION Laminator Paper/Foil Products CITY/TWP Caldwell
 SIC CODE 3497 SCC CODE _____
 SOURCE DESCRIPTION Laminators 1, 2, 3, 4, + 5 and
Flexographic Printing Lines 1 + 2
 START-UP DATE 10/14/94

EMISSIONS:

Pollutants	Air Quality Designation	Actual Emissions		PTI Allowable Emissions	
		lb/hr, etc.	TPY	lb/hr, etc.	TPY
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					249.00
Nitrogen Oxides	Attainment				
Carbon Monoxide					
Lead	Attainment				
Other: Air Toxics (see other side)	Unclassified				

APPLICABLE FEDERAL RULES: ___ NSPS ___ NESHAP ___ PSD ___ OFFSET POLICY

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

249.00 TPY VOC Facility Emission Cap computed on a 12 month rolling average

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? 0

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? ___ YES X NO
 (IF YES, turn to other side and complete "Toxic Air Contaminants" Section)

PERSON COMPLETING FORM

David J. Carter

DATE

7/25/94

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

WAS AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

*IF YES, ATTACHED MODELING RESULTS IF NO, ATTACH NEW SOURCE CODING FORM

IDENTIFY AIR CONTAMINANTS: _____
