



Street Address:

State of Ohio Environmental Protection Agency
Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

**RE: FINAL PERMIT TO INSTALL
CUYAHOGA COUNTY
Application No: 13-03677**

CERTIFIED MAIL

DATE: 8/17/00

Weyerhaeuser Packaging, Inc.
David Gawelek
22475 Aurora Road
Bedford Heights, OH 44146-1298

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 Review Appeals Commission 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 within thirty (30) days after the 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 Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

CBAPC



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: August 17, 2000
Effective Date: August 17, 2000**

FINAL PERMIT TO INSTALL 13-03677

Application Number: 13-03677
APS Premise Number: 1318043843
Permit Fee: **\$800**
Name of Facility: Weyerhaeuser Packaging, Inc.
Person to Contact: David Gawelek
Address: 22475 Aurora Road
Bedford Heights, OH 44146-1298

Location of proposed air contaminant source(s) [emissions unit(s)]:
**22475 Aurora Road
Bedford Heights, Ohio**

Description of proposed emissions unit(s):
Installation of two flexographic folder/gluer units.

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

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 Related to Monitoring and Recordkeeping 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, 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 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 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

12. 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.

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

Weyerhaeuser Packaging, Inc.
PTI Application: 13-03677
Issued: August 17, 2000

Facility ID: 1318043843

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 Compounds (VOC)	84.10
Hazardous Air Pollutants (HAPs)	9.0
individual combined	9.8

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>
K001 - S and S 38 inch by 80 inch flexo folder gluer	OAC rule 3745-21-09(Y)(1)(a)(ii) OAC rule 3745-31-05(A)(3) 40 CFR 63 Subpart KK OAC rule 3745-31-05(D) Synthetic Minor to avoid NSR OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied Volatile Organic Compound emissions from the inks and adhesives shall not exceed 42.05 tpy; and 31.58 lbs/hr from inks and 0.38 lb/hr from adhesives. See Terms A.2.e, A.2.f. See Terms A.2.a, A.2.b, A.2.c, B.2.a, B.2.b. See Terms A.2.a, A.2.b, A.2.c, B.2.a, B.2.b.

2. Additional Terms and Conditions

- 2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this source shall not exceed 4.5 tons/year for any single HAP and 4.9 tons/year for any combination of HAPs. VOC emissions are restricted to 42.05 tons/year. Compliance with the above limitations shall be based on a rolling 12-month summation.
- 2.b The maximum annual ink usage for this emissions unit shall not exceed 1,000,000 lbs/yr.
- 2.c The maximum annual adhesive usage for this emissions unit shall not exceed 154,800 lbs/yr.

- 2.d Compliance with the Air Toxics Policy.
- 2.e The permittee shall use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
- 2.f The permittee shall use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

B. Operational Restrictions

1. The maximum annual ink usage for this emissions unit shall not exceed 1,000,000 lbs/yr, based upon a rolling 12-month summation of the ink usage. This ink usage restriction (combined with the adhesive usage restriction) will limit maximum single HAP emissions to 4.5 tons, combined HAPs emissions to 4.9 tons and VOC emissions to 42.05 tons per rolling 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the ink usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Ink Usage (lbs)</u>
1	250,000
1-2	318,181
1-3	386,362
1-4	454,543
1-5	522,724
1-6	590,905
1-7	659,086
1-8	727,267
1-9	795,448
1-10	863,629
1-11	931,810
1-12	1,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual ink usage limitation shall be based upon a rolling, 12-month summation of the ink usage.

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PTI

Emissions Unit ID: K001

Issued: August 17, 2000

2. The maximum annual adhesive usage for this emissions unit shall not exceed 154,800 lbs/yr, based upon a rolling 12-month summation of the adhesive usage. This adhesive usage restriction (combined with the ink usage restriction) will limit maximum single HAP emissions to 4.5 tons, combined HAPs emissions to 4.9 tons and VOC emissions to 42.05 tons per rolling 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the adhesive usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Adhesive Usage (lbs)</u>
1	38,700
1-2	46,254
1-3	59,808
1-4	70,362
1-5	80,916
1-6	91,470
1-7	102,024
1-8	112,578
1-9	123,132
1-10	133,686
1-11	144,240
1-12	154,800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive usage limitation shall be based upon a rolling, 12-month summation of the adhesive usage.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each adhesive and ink, as applied.
 - b. The VOC content of each adhesive and ink in percent VOC by volume of the volatile matter in the adhesive and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall maintain monthly records of the following information:
 - a. The adhesive and ink usage for each month, in pounds.

- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the adhesive and ink usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive and ink usage for each calendar month.

3. The permittee shall collect and record the following information each day:
 - a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of adhesive and ink, as applied

- b. The total individual HAP emissions for each HAP from all adhesive and ink employed, in pounds or tons per month and pounds or tons per rolling 12-month period.
4. The permit to install for this emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Vinyl Acetate
TLV (ug/m3): 35,000
Maximum Hourly Emission Rate (lbs/hr): 0.30
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.04
MAGLC (ug/m3): 833.33

Pollutant: Toluene
TLV (ug/m3): 188,500
Maximum Hourly Emission Rate (lbs/hr): 0.003
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.01
MAGLC (ug/m3): 4488.10

Pollutant: Formaldehyde
TLV (ug/m3): Not established
Maximum Hourly Emission Rate (lbs/hr): 0.007
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): -----
MAGLC (ug/m3): Not established

Pollutant: Acetaldehyde
TLV (ug/m3): Not established
Maximum Hourly Emission Rate (lbs/hr): 0.53
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): -----
MAGLC (ug/m3): Not established

Pollutant: Glycol Ethers
TLV (ug/m3): Not established
Maximum Hourly Emission Rate (lbs/hr): 3.42

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PTI

Emissions Unit ID: K001

Issued: August 17, 2000

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): -----

MAGLC (ug/m3): Not established

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

7. The permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with the 10 tpy and 25 tpy limitations, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Bureau of Air Pollution Control in writing of any monthly record showing the use of noncomplying coatings and inks. The notification shall include a copy of such record and shall be sent to the Cleveland Bureau of Air Pollution Control within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative adhesive and ink usage levels. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall notify the Cleveland Bureau of Air Pollution Control of any monthly record showing deviation from the following:
 - a. The total individual HAP emissions limitation for each HAP from all adhesives and inks employed.
 - b. The total combined HAP emissions from all coatings and cleanup materials employed.

The reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance. The reports shall be submitted by January 31 of each year.

4. The permittee shall submit initial notification reports in accordance with 40 CFR 63 Subpart KK.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

b. Emission Limitation:

Individual HAP emissions shall not exceed 4.5 tpy based upon a rolling 12-month summation, and combined HAPs emissions shall not exceed 4.9 tpy based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance with the emissions limitations shall be determined pursuant to the record keeping requirements. Compliance shall be demonstrated with the following equation:

Ink / Adhesive: $\text{Ink/Adhesive usage (lbs/hr)} \times \text{HAP content} \times \text{hrs/yr} / 2000 \text{ lbs/ton}$

HAP content shall be determined using USEPA Method 24.

c. Emission Limitation:

Volatile Organic Compound emissions from the inks and adhesives shall not exceed 42.05 tpy; and 31.58 lbs/hr from inks and 0.38 lb/hr from adhesives, based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the ink and adhesive material usage limitations and record keeping requirements.

d. Emission Limitation:

1,000,000 lbs/yr ink usage based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements.

e. Emission Limitation:

154,800 lbs/yr adhesive usage based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements.

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Issued: August 17, 2000

Emissions Unit ID: K001

- f. Emission Limitation:
10 tpy of a single HAP, and 25 tpy of combined HAPs in accordance with 40 CFR 63 Subpart KK

Applicable Compliance Method:
Compliance shall be demonstrated by term E.1.b above.

F. Miscellaneous Requirements

The following terms and conditions in this permit to install are federally enforceable: A.2.a, A.2.b, A.2.c, A.2.e, A.2.f, B.1, B.2, C.1, C.2, C.3, C.4, D.1, D.2, and D.3.

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>
K002 - Ward 66 inch by 146 inch flexo folder gluer	OAC rule 3745-21-09(Y)(1)(a)(ii)	VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied
	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound emissions from the inks and adhesives shall not exceed 42.05 tpy; and 56.72 lbs/hr from inks and 0.69 lb/hr from adhesives.
	40 CFR 63 Subpart KK	See Terms A.2.e, A.2.f.
	OAC rule 3745-31-05(D) Synthetic Minor to avoid NSR	See Terms A.2.a, A.2.b, A.2.c, B.2.a, B.2.b.
	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V	See Terms A.2.a, A.2.b, A.2.c, B.2.a, B.2.b.

2. Additional Terms and Conditions

- 2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this source shall not exceed 4.5 tons/year for any single HAP and 4.9 tons/year for any combination of HAPs. VOC emissions are restricted to 42.05 tons/year. Compliance with the above limitations shall be based on a rolling 12-month summation.

- 2.b The maximum annual ink usage for this emissions unit shall not exceed 1,000,000 lbs/yr.
- 2.c The maximum annual adhesive usage for this emissions unit shall not exceed 154,800 lbs/yr.
- 2.d Compliance with the Air Toxics Policy.
- 2.e The permittee shall use less than 9.1 Mg (10 tons) per each rolling 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
- 2.f The permittee shall use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.

B. Operational Restrictions

- 1. The maximum annual ink usage for this emissions unit shall not exceed 1,000,000 lbs/yr, based upon a rolling 12-month summation of the ink usage. This ink usage restriction (combined with the adhesive usage restriction) will limit maximum single HAP emissions to 4.5 tons, combined HAPs emissions to 4.9 tons and VOC emissions to 42.05 tons per rolling 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the ink usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Ink Usage (lbs)</u>
1	250,000
1-2	318,181
1-3	386,362
1-4	454,543
1-5	522,724
1-6	590,905
1-7	659,086
1-8	727,267
1-9	795,448
1-10	863,629
1-11	931,810
1-12	1,000,000

Weyerhaeuser Packaging, Inc.

PTI Application 13-03677

Issue

Facility ID: 1318043843

Emissions Unit ID: K002

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual ink usage limitation shall be based upon a rolling, 12-month summation of the ink usage.

2. The maximum annual adhesive usage for this emissions unit shall not exceed 154,800 lbs/yr, based upon a rolling 12-month summation of the adhesive usage. This adhesive usage restriction (combined with the ink usage restriction) will limit maximum single HAP emissions to 4.5 tons, combined HAPs emissions to 4.9 tons and VOC emissions to 42.05 tons per rolling 12-month period.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the adhesive usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Adhesive Usage (lbs)</u>
1	38,700
1-2	46,254
1-3	59,808
1-4	70,362
1-5	80,916
1-6	91,470
1-7	102,024
1-8	112,578
1-9	123,132
1-10	133,686
1-11	144,240
1-12	154,800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive usage limitation shall be based upon a rolling, 12-month summation of the adhesive usage.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each adhesive and ink, as applied.
 - b. The VOC content of each adhesive and ink in percent VOC by volume of the volatile matter in the adhesive and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].
2. The permittee shall maintain monthly records of the following information:
 - a. The adhesive and ink usage for each month, in pounds.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the adhesive and ink usage figures.

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Emissions Unit ID: **K002**

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive and ink usage for each calendar month.

- 3 The permittee shall collect and record the following information each day:

- a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of adhesive and ink, as applied
 - b. The total individual HAP emissions for each HAP from all adhesive and ink employed, in pounds or tons per month and pounds or tons per rolling 12-month period.
- 4 The permit to install for this emissions unit K002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Vinyl Acetate

TLV (ug/m3): 35,000

Maximum Hourly Emission Rate (lbs/hr): 0.30

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.04

MAGLC (ug/m3): 833.33

Pollutant: Toluene

TLV (ug/m3): 188,500

Maximum Hourly Emission Rate (lbs/hr): 0.003

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.01

MAGLC (ug/m3): 4488.10

Pollutant: Formaldehyde

TLV (ug/m3): Not established

Maximum Hourly Emission Rate (lbs/hr): 0.007

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): -----

MAGLC (ug/m3): Not established

Pollutant: Acetaldehyde

TLV (ug/m3): Not established

Maximum Hourly Emission Rate (lbs/hr): 0.53

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): -----

MAGLC (ug/m3): Not established

Weyerhaeuser Packaging, Inc.
PTI Application 13-03677
Issue

Facility ID: 1318043843

Emissions Unit ID: K002

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Pollutant: Glycol Ethers

TLV (ug/m3): Not established

Maximum Hourly Emission Rate (lbs/hr): 3.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): -----

MAGLC (ug/m3): Not established

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

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- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
7. The permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with the 10 tpy and 25 tpy limitations, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Bureau of Air Pollution Control in writing of any monthly record showing the use of noncomplying coatings and inks. The notification shall include a copy of such record and shall be sent to the Cleveland Bureau of Air Pollution Control within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative adhesive and ink usage levels. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(1).
3. The permittee shall notify the Cleveland Bureau of Air Pollution Control of any monthly record showing deviation from the following:
 - a. The total individual HAP emissions limitation for each HAP from all adhesives and inks employed.
 - b. The total combined HAP emissions from all coatings and cleanup materials employed.

The reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance. The reports shall be submitted by January 31 of each year.

4. The permittee shall submit initial notification reports in accordance with 40 CFR 63 Subpart KK.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
 - b. Emission Limitation:
Individual HAP emissions shall not exceed 4.5 tpy based upon a rolling 12-month summation, and combined HAPs emissions shall not exceed 4.9 tpy based upon a rolling 12-month summation.

Applicable Compliance Method:
Compliance with the emissions limitations shall be determined pursuant to the record keeping requirements. Compliance shall be demonstrated with the following equation:

Ink / Adhesive: $\text{Ink/Adhesive usage (lbs/hr)} \times \text{HAP content} \times \text{hrs/yr} / 2000 \text{ lbs/ton}$

HAP content shall be determined using USEPA Method 24.
 - c. Emission Limitation:
Volatile Organic Compound emissions from the inks and adhesives shall not exceed 42.05 tpy; and 31.58 lbs/hr from inks and 0.38 lb/hr from adhesives, based upon a rolling 12-month summation.

Applicable Compliance Method:
Compliance shall be demonstrated by the ink and adhesive material usage limitations and record keeping requirements.
 - d. Emission Limitation:

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1,000,000 lbs/yr ink usage based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements.

e. Emission Limitation:

154,800 lbs/yr adhesive usage based upon a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements.

f. Emission Limitation:

10 tpy of a single HAP, and 25 tpy of combined HAPs in accordance with 40 CFR 63 Subpart KK

Applicable Compliance Method:

Compliance shall be demonstrated by term E.1.b above.

F. Miscellaneous Requirements

The following terms and conditions in this permit to install are federally enforceable: A.2.a, A.2.b, A.2.c, A.2.e, A.2.f, B.1, B.2, C.1, C.2, C.3, C.4, D.1, D.2, and D.3.

NEW SOURCE REVIEW FORM B

PTI Number: 13-03677 Facility ID: 1318043843

FACILITY NAME Weyerhaeuser Packaging, Inc.

FACILITY DESCRIPTION Installation of two flexographic folder/gluer units. CITY/TWP Bedford Heights

SIC CODE 2653 SCC CODE 4-05-002-11 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION S and S 38 inch by 80 inch flexo folder gluer

DATE INSTALLED upon issuance of pti

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	31.96 lbs/hr	42.05	31.96 lbs/hr	42.05
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics	unclassified	3.42 lbs/hr	4.5 single 4.9 combined HAPs	3.42 lbs/hr 3.73 lbs/hr	4.5 single 4.9 combined HAPs

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR 63 PSD? OFFSET POLICY?
Subpart KK

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

Enter Determination The BAT determination for the source is compliance with the terms and conditions of this permit, Air Toxics Policy and the federal MACT Standards. The basis for the determination is knowledge of the process and equipment.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Vinyl acetate and toluene

