

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 13-03870

**A. Source Description**

Weyerhaeuser Packaging, Inc. has submitted a permit to install application to cover all existing emissions units at the facility. Two printing emissions units have an existing synthetic minor PTI (PTI #13-03677; Issued 08/17/00). In addition, a synthetic minor PTI exists for the corrugator (PTI #13-03708; Issued 07/11/00). Four emissions units were installed after Jan. 1, 1974 by previous owners of the facility, but PTI applications were never submitted by Weyerhaeuser Packaging, Inc. when they purchased the facility in November 1999. Three emissions units were installed before Jan. 1, 1974; however, they will be included in this permit action at the request of the company. Weyerhaeuser Packaging, Inc. submitted applications for the facility in order to receive facility-wide synthetic minor restrictions. The terms and conditions of this PTI will supercede the terms and conditions of both PTI 13-03677 and PTI 13-03708.

**B. Facility Emissions and Attainment Status**

This facility is classified as a major source for Title V purposes; however, the facility is not subject to PSD. The Title V applicability was determined based on the facility-wide PTE calculations derived using the PIO guidelines, which indicate that the facility emits VOC emissions in excess of 100 TPY (132 tpy VOC) and the potential to emit HAPs at greater than the 10/25 tpy thresholds. Since the emissions are less than 250 tpy for the applicable source category, the facility is not subject to PSD. The synthetic minor restrictions would limit the PTE to below Title V thresholds. Cuyahoga County is designated as attainment for ozone (1-hr average).

**C. Source Emissions**

These sources have the potential to emit (PTE) more than 100 tpy VOC (132 tpy) when combined, resulting in Title V applicability. In addition, these sources have a PTE of more than 10 tpy single HAP and 25 tpy combined HAPs. The permittee has chosen to restrict emissions and materials used from these sources to below the 100 tpy Title V VOC threshold and below the 10/25 tpy HAP threshold. To develop a flexible permit per the USEPA and Ohio EPA guidelines, the allowable emissions limits will be set equal to their potential limits defined by the PIO guidelines. In addition, a facility-wide cap will be placed on the VOC and HAP emissions, and materials usage, to ensure enforceability with the synthetic minor restrictions. This would ease recordkeeping requirements for the facility. The following table summarizes the potential and allowable emissions for the facility sources:

**Facility-Wide VOC and HAP emissions:**

| Facility-Wide VOC PTE (tpy) | Facility-Wide HAP PTE (tpy) | Actual Facility VOC emissions, CY2001 (tpy) | Actual Facility combined HAP emissions, CY2000 (tpy) | Proposed Facility-wide VOC emissions (tpy) | Proposed Facility-wide HAP emissions (tpy single HAP / tpy combined HAPs) |
|-----------------------------|-----------------------------|---|--|--|---|
| 132                         | 11.6                        | 3.2   | 0.28   | 99.0                                       | 9.9 / 24.9  |

\* PTE based on the PIO calculation guidelines for VOCs. Potential HAP emissions calculated as a % of potential VOCs derived from the actual usage.

**VOC/HAP emissions:**

| <b>Emissions Unit</b> | <b>VOC Potential (tpy)</b> | <b>HAPs Potential (tpy)</b> | <b>Actual VOC, CY 2001 (tpy)</b> | <b>Proposed Daily VOC Allowable (lbs/day)</b> | <b>Proposed Annual VOC Allowable (tpy)</b> | <b>Proposed Annual HAP Allowable, facility-wide (tpy)</b> |
|-----------------------|----------------------------|-----------------------------|----------------------------------|---|--|---|
| K003                  | 27.7                       | 2.426277376                 | 0.51                             | 152   | 27.7                                       | 10 / 25   |
| K004                  | 13.05                      | 1.143065695                 | 0.11                             | 72  | 13.05                                      | 10 / 25   |
| K005                  | 11.32                      | 0.991532848                 | 0.25                             | 63  | 11.32                                      | 10 / 25   |
| K006                  | 30.82                      | 2.699562048                 | 0.15                             | 169   | 30.82                                      | 10 / 25   |
| K007                  | 1.08                       | 0.09459854                  | 0.15                             | 6   | 1.08                                       | 10 / 25   |
| K008                  | 22.7                       | 1.988321171                 | 0.11                             | 125   | 22.7                                       | 10 / 25   |
| K009                  | 1.08                       | 0.09459854                  | 0.002                            | 6   | 1.08                                       | 10 / 25   |
| K010                  | 8.49                       | 0.743649636                 | 0.11                             | 47  | 8.49                                       | 10 / 25   |
| P001                  | 16.39                      | 1.43562044                  | 1.74                             | 90  | 16.39                                      | 10 / 25   |
| P002                  | 0.0                        | 0                           | 0                                | 0   | 0.0  | 10 / 25   |
| <b>Total</b>          | <b>132.63</b>              | <b>11.61722629</b>          | <b>3.132</b>                     | <b>730</b>                                    | <b>99.0</b>                                | <b>9.9 / 24.9</b>   |

\* PTE based on the PIO calculation guidelines for VOCs. Potential HAP emissions calculated as a % of potential VOCs derived from the actual usage.

**D. Conclusion**

The Cleveland Local Air Agency (CLAA) recommends approval of the approach outlined above because a review of the historical facility material usage data (summary from January 1996 to June 2002) verifies that the actual facility emissions are significantly lower than the theoretical potential emissions. A review of the current facility standard operating procedures also indicates an acceptable systematic approach that should ensure compliance. In addition, the Weyerhaeuser Company (located in Valley View, Ohio) has already set a precedence for similar approaches through the issuance of PTI # 13-04014 as agreed upon by the Ohio EPA.



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No:** 13-03870

**Fac ID:** 1318043843

**DATE:** 10/14/2004

Weyerhaeuser Company  
Scott Engstrom  
22475 Aurora Road  
Bedford Heights, OH 441461298

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: USEPA

CLAA

PA

**CUYAHOGA COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 13-03870 FOR AN AIR CONTAMINANT SOURCE FOR  
Weyerhaeuser Company**

On 10/14/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Weyerhaeuser Company**, located at **22475 Aurora Road, Bedford Heights, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-03870:

**Facility-wide synthetic minor permit including: rotary die cutter, label laminator, folder/gluer, printer slotter, flexofolder gluers, corrugator, and platen die cutter -- K003-K010 and P001-P002.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue,  
Cleveland, OH 44114 [(216)664-2324]



**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 13-03870**

Application Number: 13-03870  
Facility ID: 1318043843  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Weyerhaeuser Company  
Person to Contact: Scott Engstrom  
Address: 22475 Aurora Road  
Bedford Heights, OH 441461298

Location of proposed air contaminant source(s) [emissions unit(s)]:

**22475 Aurora Road  
Bedford Heights, Ohio**

Description of proposed emissions unit(s):

**Facility-wide synthetic minor permit including: rotary die cutter, label laminator, folder/gluer, printer slotter, flexofolder gluers, corrugator, and platen die cutter -- K003-K010 and P001-P002.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Weyerhaeuser Company

Facility ID: 1318043843

PTI Application: 13-03870

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**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, 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

**Weyerhaeuser Company**  
**PTI Application: 13-03870**

**Facility ID: 1318043843**

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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

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lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

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

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

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

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**Weyerhaeuser Company**

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**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> |
|------------------|----------------------|
| VOC              | 99.0                 |
| Single HAP       | 9.9                  |
| Combined HAP     | 24.9                 |
| PE               | 11.2                 |

**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>  |
|---|--|---|
| K003 - S & S (38 in. x 80 in.) Flexo Folder Gluer (Previously known as K001)      | OAC rule 3745-31-05(A)(3)                                  | Volatile organic compound (VOC) emissions for this emissions unit shall not exceed 152.0 lbs/day and 27.7 tpy* from a combination of inks, coatings, adhesives, and clean-up material for this emission unit. |
| Terms in this permit supercede those identified in PTI #13-03677 issued 08/17/00. |  | * as a 12-month rolling summation   |
|   |  | See A.2.c.  |
|   | 40 CFR 63 Subpart KK                                       | The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), 40 CFR 63 Subpart KK and OAC rule 3745-35-07(B).   |
|   | OAC rule 3745-21-09(Y)(1)(a)                               | See A.2.a   |
|   | OAC rule 3745-35-07(B)<br>Synthetic Minor to avoid Title V | VOC content of the coatings and inks employed shall not exceed twenty-five percent VOC by volume of the volatile matter in the coatings and inks.   |
|   |  | Volatile organic compound (VOC)   |

Weyer  
PTI A

Emissions Unit ID: **K003**

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emissions from the facility\* shall not exceed 99.0 tons per rolling 12-month period.

See A.2.b, B.1. and B.2.

**2. Additional Terms and Conditions**

**2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:

- i. 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; and
- ii. 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.

**2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.

**2.c** The daily and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.

\* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

\*\* the potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for the facility\* shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

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

2. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

\* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

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

1. The permittee shall collect and record the VOC content of each coating in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons; and
  - f. the actual operation hours for all printing presses combined, in hours per month.

- \* flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K003, K004, K005, K006, K008, and K010.
- \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

3. The permittee shall collect and record the following information each month for the facility\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. the individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. the total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup\*\* materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, and subtracting any recovered material\*\* in pounds per month; and
  - h. the rolling, 12-month summation of each individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in tons.

Emissions Unit ID: **K003**

- \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
  - \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.
4. The permittee shall collect and record the following information for this emission unit each month:
- a. the actual monthly press operation hours, in hours per month;
  - b. the number of days the press operated during the month;
  - c. the monthly VOC emissions, calculated as [(3.d.) x (most recent product per press allocation factor\*)], in pounds per month; and
  - d. the average daily VOC emissions, calculated as [(4.c.) / (4.b.)].
- \* the 'product per press allocation factor' is calculated following the guidelines outlined in the Printing Industry of Ohio (PIO's) resource document titled "A Self Help Guide to Environmentally Sound Printing Operations" and is based on typical material usage rates and print capacity.
5. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:
- a. the date the materials from the recovery drum or tank were shipped off site;
  - b. the amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;
  - c. the average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);
  - d. the average VOC content for the recovered cleanup/purge material, in percent by weight; and
  - e. the average VOC emissions from the recovered cleanup/purge materials [(5.b.) x (5.d.)],

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in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as [(5.b.) x (5.c.) x (5.d.)] if the material amount is recorded in gallons.

- \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
6. The permit to install for this emissions unit was evaluated based on the actual 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:
- a. Pollutant: Ammonia  
TLV (mg/m<sup>3</sup>): 17.41  
Maximum Hourly Emission Rate (lbs/hr): 6.33 (ink and adhesive)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.02842  
MAGLC (ug/m<sup>3</sup>): 414.60
  - b. Pollutant: Isopropyl Alcohol  
TLV (mg/m<sup>3</sup>): 12.29  
Maximum Hourly Emission Rate (lbs/hr): 6.33 (ink and adhesive)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1.266  
MAGLC (ug/m<sup>3</sup>): 292.58
7. 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 (inks, coatings, adhesives, 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 8. 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.

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

- 1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (25% VOC by volume of the volatile matter in the coating). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified.
- 2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:

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- a. a copy of any such record;
  - b. an identification of the probable cause for such deviation; and
  - c. any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
- a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

\* the facility shall include emissions from the following units: K003-K010, P001, and P002.

4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:
- a. the name, title and address of the owner or operator;
  - b. the address (i.e., physical location) of the affected source;
  - c. identification of the applicable emission limitations and compliance date;
  - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
  - e. a brief description of each affected emissions unit, including the type of process operation

performed.

- \* the permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].

## E. Testing Requirements

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
152.0 lbs VOC / day

Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C.

- b. Emission Limitation:  
27.7 tpy VOC

Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:

$$\text{VOC (tpy)} = (\text{summation of Section C.4.c. over the previous 12-month calendar year}) / 2000$$

- c. Emission Limitation:  
99.0 tons VOC per rolling, 12-month period for this facility\*

Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.

- d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.

- e. Emission Limitation:  
24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*

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Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections C.

f. Operational Limitation:

VOC content of all coatings shall not exceed 25 % VOC by volume of the volatile matter in the coatings and ink.

Applicable Compliance Method:

Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) and 24A (for flexographic and rotogravure printing inks) of 40 CFR, Part 60, Appendix A.

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K003-K010, P001, and P002.

**F. Miscellaneous Requirements**

1. This Permit to Install replaces PTI No.13-03677, issued August 17, 2000, for this emissions unit.
2. The following terms and conditions are federally enforceable: A., B.1, C.1.-5., D. and E.

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

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

- 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>   |
|--|--|--|
| <p>K004 - Ward (66 in. x 146 in.) Flexo Folder Gluer (Previously known as K002)</p>      | <p>OAC rule 3745-31-05(A)(3)</p>                                   | <p>Volatile organic compound (VOC) emissions for this emissions unit shall not exceed 72.0 lbs/day and 13.05 tpy* from a combination of inks, coatings, adhesives, and cleanup material for this emission unit .</p> |
| <p>Terms in this permit supercede those identified in PTI #13-03677 issued 08/17/00.</p> | <p>40 CFR 63 Subpart KK</p>  | <p>* as a 12-month rolling summation</p>   |
|  | <p>OAC rule 3745-21-09(Y)(1)(a)</p>                                | <p>See A.2.c.</p>  |
|  | <p>OAC rule 3745-35-07(B)<br/>Synthetic Minor to avoid Title V</p> | <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), 40 CFR 63 Subpart KK and OAC rule 3745-35-07(B).</p>   |
|  |  | <p>See A.2.a</p>   |
|  |  | <p>VOC content of the coatings and inks employed shall not exceed twenty-five percent VOC by volume of the volatile matter in the coatings and inks.</p>   |

Volatile organic compound (VOC) emissions from the facility\* shall not exceed 99.0 tons per rolling 12-month period.

See A.2.b. and B.1 and B.2.

## **2. Additional Terms and Conditions**

- 2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:
- i. 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; and
  - ii. 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.
- 2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.
- 2.c** The daily and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.
- \* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002 .
- \*\* the potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

## **B. Operational Restrictions**

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1. The maximum annual volatile organic material usage for the facility\* shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

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

2. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

\* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

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

1. The permittee shall collect and record the VOC content of each coating in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;

- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons; and
- f. the actual operation hours for all printing presses combined, in hours per month.
- \* flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K003, K004, K005, K006, K008, and K010.
- \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

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3. The permittee shall collect and record the following information each month for the facility\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. the individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. the total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup\*\* materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, and subtracting any recovered material\*\* in pounds per month; and
  - h. the rolling, 12-month summation of each individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in tons.
- \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
- \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

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4. The permittee shall collect and record the following information for this emission unit each month:
  - a. the actual monthly press operation hours, in hours per month;
  - b. the number of days the press operated during the month;
  - c. the monthly VOC emissions, calculated as [(3.d.) x (most recent product per press allocation factor\*)], in pounds per month; and
  - d. the average daily VOC emissions, calculated as [(4.c.) / (4.b.)].

\* the 'product per press allocation factor' is calculated following the guidelines outlined in the Printing Industry of Ohio (PIO's) resource document titled "A Self Help Guide to Environmentally Sound Printing Operations" and is based on typical material usage rates and print capacity.
  
5. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:
  - a. the date the materials from the recovery drum or tank were shipped off site;
  - b. the amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;
  - c. the average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);
  - d. the average VOC content for the recovered cleanup/purge material, in percent by weight; and
  - e. the average VOC emissions from the recovered cleanup/purge materials [(5.b.) x (5.d.)], in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as [(5.b.) x (5.c.) x (5.d.)] if the material amount is recorded in gallons.

\* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.

Emissions Unit ID: **K004**

6. The permit to install for this emissions unit was evaluated based on the actual 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:
- a. Pollutant: Ammonia  
TLV (mg/m<sup>3</sup>): 17.41  
Maximum Hourly Emission Rate (lbs/hr): 2.98 (ink and adhesive)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.0134  
MAGLC (ug/m<sup>3</sup>): 414.60
  - b. Pollutant: Isopropyl Alcohol  
TLV (mg/m<sup>3</sup>): 12.29  
Maximum Hourly Emission Rate (lbs/hr): 2.98 (ink and adhesive)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.5958  
MAGLC (ug/m<sup>3</sup>): 292.58
7. 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 (inks, coatings, adhesives, 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

8. 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.

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

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (25% VOC by volume of the volatile matter in the coating). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified.
2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:
  - a. a copy of any such record;
  - b. an identification of the probable cause for such deviation; and
  - c. any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
- a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

\* the facility shall include emissions from the following units: K003-K010, P001, and P002.

4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:
- a. the name, title and address of the owner or operator;
  - b. the address (i.e., physical location) of the affected source;
  - c. identification of the applicable emission limitations and compliance date;
  - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
  - e. a brief description of each affected emissions unit, including the type of process operation performed.
- \* the permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].

## **E. Testing Requirements**

Emissions Unit ID: **K004**

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
72.0 lbs VOC / day  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C.
  - b. Emission Limitation:  
13.05 tpy VOC  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:  
  
$$\text{VOC (tpy)} = (\text{summation of Section C.4.c. over the previous 12-month calendar year}) / 2000$$
  - c. Emission Limitation:  
99.0 tons VOC per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.
  - d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.
  - e. Emission Limitation:  
24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.
  - f. Operational Limitation:  
VOC content of all coatings shall not exceed 25 % VOC by volume of the volatile matter in the coatings and ink.

Weyer

PTI A

Emissions Unit ID: **K004****Issued: To be entered upon final issuance****Applicable Compliance Method:**

Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) and 24A (for flexographic and rotogravure printing inks) of 40 CFR, Part 60, Appendix A.

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K003-K010, P001, and P002 .

**F. Miscellaneous Requirements**

1. This Permit to Install replaces PTI No.13-03677, issued August 17, 2000, for this emissions unit.
2. The following terms and conditions are federally enforceable: A., B.1, C.1.-5., D. and E.

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

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

- 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>  |
|--|--|---|
| K005 - Kopper (35 in. x 85 in.) Flexographic Printer Slotter | OAC rule 3745-31-05(A)(3)                                  | Volatile organic compound (VOC) emissions for this emissions unit shall not exceed 63.0 lbs/day and 11.32 tpy* from a combination of inks, coatings, adhesives, and cleanup material for this emission unit . |
|  |  | * as a 12-month rolling summation   |
|  |  | See A.2.c.  |
|  | 40 CFR 63 Subpart KK                                       | The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), 40 CFR 63 Subpart KK and OAC rule 3745-35-07(B).   |
|  | OAC rule 3745-21-09(Y)(1)(a)                               | See A.2.a   |
|  | OAC rule 3745-35-07(B)<br>Synthetic Minor to avoid Title V | VOC content of the coatings and inks employed shall not exceed twenty-five percent VOC by volume of the volatile matter in the coatings and inks.   |

Weyer

PTI A

Emissions Unit ID: **K005****Issued: To be entered upon final issuance**

Volatile organic compound (VOC) emissions from the facility\* shall not exceed 99.0 tons per rolling 12-month period.

See A.2.b., B.1 and B.2.

**2. Additional Terms and Conditions**

- 2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:
- i. 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; and
  - ii. 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.
- 2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.
- 2.c** The daily and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.
- \* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.
- \*\* the potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

**B. Operational Restrictions**

Emissions Unit ID: **K005**

1. The maximum annual volatile organic material usage for the facility\* shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

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

2. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

\* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

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

1. The permittee shall collect and record the VOC content of each coating in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons; and

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- f. the actual operation hours for all printing presses combined, in hours per month.
  - \* flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K003, K004, K005, K006, K008, and K010.
  - \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.
3. The permittee shall collect and record the following information each month for the facility\*:
- a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. the individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. the total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup\*\* materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, and subtracting any recovered material\*\* in pounds per month; and
  - h. the rolling, 12-month summation of each individual HAP and combined HAP material

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usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in tons.

\* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.

\*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

4. The permittee shall collect and record the following information for this emission unit each month:

a. the actual monthly press operation hours, in hours per month;

b. the number of days the press operated during the month;

c. the monthly VOC emissions, calculated as [(3.d.) x (most recent product per press allocation factor\*)], in pounds per month; and

d. the average daily VOC emissions, calculated as [(4.c.) / (4.b.)].

\* the 'product per press allocation factor' is calculated following the guidelines outlined in the Printing Industry of Ohio (PIO's) resource document titled "A Self Help Guide to Environmentally Sound Printing Operations" and is based on typical material usage rates and print capacity.

5. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:

a. the date the materials from the recovery drum or tank were shipped off site;

b. the amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;

c. the average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);

d. the average VOC content for the recovered cleanup/purge material, in percent by weight;

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and

- e. the average VOC emissions from the recovered cleanup/purge materials [(5.b.) x (5.d.)], in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as [(5.b.) x (5.c.) x (5.d.)] if the material amount is recorded in gallons.
  - \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
6. The permit to install for this emissions unit was evaluated based on the actual 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:
- a. Pollutant: Ammonia  
TLV (mg/m<sup>3</sup>): 17.41  
Maximum Hourly Emission Rate (lbs/hr): 2.59 (ink and adhesive)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.0117  
MAGLC (ug/m<sup>3</sup>): 414.60
  - b. Pollutant: Isopropyl Alcohol  
TLV (mg/m<sup>3</sup>): 12.29  
Maximum Hourly Emission Rate (lbs/hr): 2.59 (ink and adhesive)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.5179  
MAGLC (ug/m<sup>3</sup>): 292.58
7. 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 (inks, coatings, adhesives, or cleanup

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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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 8. 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.

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

- 1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (25% VOC by volume of the volatile matter in the coating). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified.

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2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:
  - a. a copy of any such record;
  - b. an identification of the probable cause for such deviation; and
  - c. any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
  
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

\*the facility shall include emissions from the following units: K003-K010, P001, and P002.

4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:
  - a. the name, title and address of the owner or operator;
  - b. the address (i.e., physical location) of the affected source;
  - c. identification of the applicable emission limitations and compliance date;

- d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
- e. a brief description of each affected emissions unit, including the type of process operation performed.
- \* the permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
63.0 lbs VOC / day  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C.
  - b. Emission Limitation:  
11.32 tpy VOC  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:  
  

$$\text{VOC (tpy)} = (\text{summation of Section C.4.c. over the previous 12-month calendar year}) / 2000$$
  - c. Emission Limitation:  
99.0 tons VOC per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.
  - d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:

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Compliance shall be determined based on the recordkeeping specified in Sections C.

- e. Emission Limitation:  
24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.
  - f. Operational Limitation:  
VOC content of all coatings shall not exceed 25 % VOC by volume of the volatile matter in the coatings and ink.  
  
Applicable Compliance Method:  
Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) and 24A (for flexographic and rotogravure printing inks) of 40 CFR, Part 60, Appendix A.
- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K003-K010, P001, and P002 .

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A., B.1, C.1.-5., D. and E.

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

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

- 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>   |
|---|--|--|
| K006 - S & S (66 in. x 135 in.)<br>Flexo Folder Gluer | OAC rule 3745-31-05(A)(3)                                  | Volatile organic compound (VOC) emissions for this emissions unit shall not exceed 169.0 lbs/day and 30.82 tpy* from a combination of inks, coatings, adhesives, and cleanup material for this emission unit . |
|   |  | * as a 12-month rolling summation  |
|   |  | See A.2.c.   |
|   | 40 CFR 63 Subpart KK                                       | The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), 40 CFR 63 Subpart KK and OAC rule 3745-35-07(B).  |
|   | OAC rule 3745-21-09(Y)(1)(a)                               | See A.2.a  |
|   | OAC rule 3745-35-07(B)<br>Synthetic Minor to avoid Title V | VOC content of the coatings and inks employed shall not exceed twenty-five percent VOC by volume of the volatile matter in the coatings and inks.  |

Volatile organic compound (VOC) emissions from the facility\* shall not exceed 99.0 tons per rolling 12-month period.

See A.2.b., B.1 and B.2.

## **2. Additional Terms and Conditions**

- 2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:
- i. 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; and
  - ii. 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.
- 2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.
- 2.c** The daily and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.
- \* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002 .
- \*\* the potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

## **B. Operational Restrictions**

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1. The maximum annual volatile organic material usage for the facility\* shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

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

2. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

\* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

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

1. The permittee shall collect and record the VOC content of each coating in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions

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from all ink, additive, adhesive, and cleanup materials employed, in tons; and

f. the actual operation hours for all printing presses combined, in hours per month.

\* flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K003, K004, K005, K006, K008, and K010.

\*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

3. The permittee shall collect and record the following information each month for the facility\*:
- a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. the individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. the total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup\*\* materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, and subtracting any recovered material\*\* in pounds per month; and
  - h. the rolling, 12-month summation of each individual HAP and combined HAP material

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usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in tons.

- \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
  - \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.
4. The permittee shall collect and record the following information for this emission unit each month:
- a. the actual monthly press operation hours, in hours per month;
  - b. the number of days the press operated during the month;
  - c. the monthly VOC emissions, calculated as [(3.d.) x (most recent product per press allocation factor\*)], in pounds per month; and
  - d. the average daily VOC emissions, calculated as [(4.c.) / (4.b.)].
- \* the 'product per press allocation factor' is calculated following the guidelines outlined in the Printing Industry of Ohio (PIO's) resource document titled "A Self Help Guide to Environmentally Sound Printing Operations" and is based on typical material usage rates and print capacity.
5. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:
- a. the date the materials from the recovery drum or tank were shipped off site;
  - b. the amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;
  - c. the average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);

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- d. the average VOC content for the recovered cleanup/purge material, in percent by weight; and
  - e. the average VOC emissions from the recovered cleanup/purge materials [(5.b.) x (5.d.)], in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as [(5.b.) x (5.c.) x (5.d.)] if the material amount is recorded in gallons.
  - \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
6. The permit to install for this emissions unit was evaluated based on the actual 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:
- a. Pollutant: Ammonia  
TLV (mg/m<sup>3</sup>): 17.41  
Maximum Hourly Emission Rate (lbs/hr): 7.04 (ink and adhesive)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.0316  
MAGLC (ug/m<sup>3</sup>): 414.60
  - b. Pollutant: Isopropyl Alcohol  
TLV (mg/m<sup>3</sup>): 12.29  
Maximum Hourly Emission Rate (lbs/hr): 7.04 (ink and adhesive)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1.4075  
MAGLC (ug/m<sup>3</sup>): 292.58
7. 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 (inks, coatings, adhesives, or cleanup

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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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

8. 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.

**D. Reporting Requirements**

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (25% VOC by volume of the volatile matter in the coating). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified.

2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:
  - a. a copy of any such record;
  - b. an identification of the probable cause for such deviation; and
  - c. any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
  
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

\*the facility shall include emissions from the following units: K003-K010, P001, and P002.
  
4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:

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- a. the name, title and address of the owner or operator;
  - b. the address (i.e., physical location) of the affected source;
  - c. identification of the applicable emission limitations and compliance date;
  - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
  - e. a brief description of each affected emissions unit, including the type of process operation performed.
- \* the permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].

**E. Testing Requirements**

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
169.0 lbs VOC / day  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C.
  - b. Emission Limitation:  
30.82 tpy VOC  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:  
  

$$\text{VOC (tpy)} = (\text{summation of Section C.4.c. over the previous 12-month calendar year}) / 2000$$
  - c. Emission Limitation:  
99.0 tons VOC per rolling, 12-month period for this facility\*

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Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.

- d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.

- e. Emission Limitation:  
24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.

- f. Operational Limitation:  
VOC content of all coatings shall not exceed 25 % VOC by volume of the volatile matter in the coatings and ink.

Applicable Compliance Method:  
Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) and 24A (for flexographic and rotogravure printing inks) of 40 CFR, Part 60, Appendix A.

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K003-K010, P001, and P002 .

## F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A., B.1, C.1.-5., D. and E.

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**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,<br/>and/or Equipment</u>         | <u>Applicable Rules/Requirements</u>                       | <u>Applicable Emissions<br/>Limitations/Control Measures</u>  |
|---|--|---|
| K007 - Crathern & Smith Label Laminator (45 in. x 60 in.) | OAC rule 3745-31-05(A)(3)                                  | Volatile organic compound (VOC) emissions for this emissions unit shall not exceed 6.0 lbs/day and 1.08 tpy* from a combination of inks, coatings, adhesives, and cleanup material for this emission unit . |
|   |  | * as a 12-month rolling summation   |
|   |  | See A.2.c.  |
|   | 40 CFR 63 Subpart KK                                       | The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), 40 CFR 63 Subpart KK and OAC rule 3745-35-07(B).   |
|   | OAC rule 3745-21-09(F)                                     | See A.2.a   |
|   | OAC rule 3745-35-07(B)<br>Synthetic Minor to avoid Title V | VOC content of the coatings employed shall not exceed 2.9 pounds VOC per gallon coating, excluding water and exempt solvents  |
|   |  | Volatile organic compound (VOC)   |

Weyer

PTI A

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emissions from the facility\* shall not exceed 99.0 tons per rolling 12-month period.

See A.2.b., B.1 and B.2.

**2. Additional Terms and Conditions**

- 2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:
- i. 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; and
  - ii. 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.
- 2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.
- 2.c** The daily and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.
- \* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.
- \*\* the potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

**B. Operational Restrictions**

Emissions Unit ID: **K007**

1. The maximum annual volatile organic material usage for the facility\* shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

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

2. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

\* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

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

1. The permittee shall collect and record the VOC content of each coating in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons; and

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- f. the actual operation hours for all printing presses combined, in hours per month.
  - \* flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K003, K004, K005, K006, K008, and K010.
  - \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.
3. The permittee shall collect and record the following information each month for the facility\*:
- a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. the individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. the total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup\*\* materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, and subtracting any recovered material\*\* in pounds per month; and
  - h. the rolling, 12-month summation of each individual HAP and combined HAP material

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usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in tons.

\* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.

\*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

4. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:

- a. the date the materials from the recovery drum or tank were shipped off site;
- b. the amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;
- c. the average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);
- d. the average VOC content for the recovered cleanup/purge material, in percent by weight; and
- e. the average VOC emissions from the recovered cleanup/purge materials [(4.b.) x (4.d.)], in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as [(4.b.) x (4.c.) x (4.d.)] if the material amount is recorded in gallons.

\* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.

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

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (2.9 pounds VOC per gallon of coating, excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar

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month during which they were identified.

2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:
  - a. a copy of any such record;
  - b. an identification of the probable cause for such deviation; and
  - c. any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
  
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

\*the facility shall include emissions from the following units: K003-K010, P001, and P002.

4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:
  - a. the name, title and address of the owner or operator;
  - b. the address (i.e., physical location) of the affected source;

- c. identification of the applicable emission limitations and compliance date;
  - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
  - e. a brief description of each affected emissions unit, including the type of process operation performed.
- \* the permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].

## E. Testing Requirements

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
6.0 lbs VOC / day  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C.
  - b. Emission Limitation:  
1.08 tpy VOC  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:  
  

$$\text{VOC (tpy)} = (\text{summation of Section C.4.c. over the previous 12-month calendar year}) / 2000$$
  - c. Emission Limitation:  
99.0 tons VOC per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.
  - d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*

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Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections C.

- e. Emission Limitation:  
24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections C.

- f. Operational Limitation:  
VOC content of all coatings shall not exceed 2.9 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) and 24A (for flexographic and rotogravure printing inks) of 40 CFR, Part 60, Appendix A.

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K003-K010, P001, and P002.

**F. Miscellaneous Requirements**

1. This Permit to Install replaces PTI No.13-03677, issued August 17, 2000, for this emissions unit.
2. The following terms and conditions are federally enforceable: A., B.1, C.1.-4., D. and E.

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**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,<br/>and/or Equipment</u>   | <u>Applicable Rules/Requirements</u> | Synthetic Minor to avoid Title V |
|---|--------------------------------------|----------------------------------|
| K008 - Ward (66 in. x 125 in.)<br>Rotary Die Cutter | OAC rule 3745-31-05(A)(3)            |                                  |
|   | 40 CFR 63 Subpart KK                 |                                  |
|   | OAC rule 3745-21-09(Y)(1)(a)         |                                  |
|   | OAC rule 3745-35-07(B)               |                                  |

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Applicable Emissions  
Limitations/Control Measures

Volatile organic compound (VOC) emissions for this emissions unit shall not exceed 125.0 lbs/day and 22.7 tpy\* from a combination of inks, coatings, adhesives, and cleanup material for this emission unit.

\* as a 12-month rolling summation

See A.2.c.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), 40 CFR 63 Subpart KK and OAC rule 3745-35-07(B).

See A.2.a

VOC content of the coatings and inks employed shall not exceed twenty-five percent VOC by volume of the volatile matter in the coatings and inks.

Volatile organic compound (VOC) emissions from the facility\* shall not exceed 99.0 tons per rolling 12-month period.

See A.2.b., B.1 and B.2.

**2. Additional Terms and Conditions**

- 2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:
- i. 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; and
  - ii. 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.
- 2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.
- 2.c** The daily and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.
- \* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002 .
- \*\* the potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

## **B. Operational Restrictions**

1. The maximum annual volatile organic material usage for the facility\* shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

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

2. To ensure enforceability during the first twelve calendar months of operation following the

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issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

- \* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

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

1. The permittee shall collect and record the VOC content of each coating in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
  2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
    - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
    - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
    - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
    - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
    - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons; and
    - f. the actual operation hours for all printing presses combined, in hours per month.
- \* flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K003, K004, K005, K006, K008, and K010.
  - \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or

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pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

3. The permittee shall collect and record the following information each month for the facility\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. the individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. the total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup\*\* materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, and subtracting any recovered material\*\* in pounds per month; and
  - h. the rolling, 12-month summation of each individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in tons.
- \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
- \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for

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recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

4. The permittee shall collect and record the following information for this emission unit each month:
  - a. the actual monthly press operation hours, in hours per month;
  - b. the number of days the press operated during the month;
  - c. the monthly VOC emissions, calculated as [(3.d.) x (most recent product per press allocation factor\*)], in pounds per month; and
  - d. the average daily VOC emissions, calculated as [(4.c.) / (4.b.)].

\* the 'product per press allocation factor' is calculated following the guidelines outlined in the Printing Industry of Ohio (PIO's) resource document titled "A Self Help Guide to Environmentally Sound Printing Operations" and is based on typical material usage rates and print capacity.
  
5. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:
  - a. the date the materials from the recovery drum or tank were shipped off site;
  - b. the amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;
  - c. the average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);
  - d. the average VOC content for the recovered cleanup/purge material, in percent by weight; and
  - e. the average VOC emissions from the recovered cleanup/purge materials [(5.b.) x (5.d.)], in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as [(5.b.) x (5.c.) x (5.d.)] if the material amount is recorded in gallons.

\* the facility emission, and usage, limits shall include the following units: K003-K010, P001,

and P002.

6. The permit to install for this emissions unit was evaluated based on the actual 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:
  - a. Pollutant: Ammonia  
TLV (mg/m<sup>3</sup>): 17.41  
Maximum Hourly Emission Rate (lbs/hr): 5.18 (ink)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.0233  
MAGLC (ug/m<sup>3</sup>): 414.60
  - b. Pollutant: Isopropyl Alcohol  
TLV (mg/m<sup>3</sup>): 12.29  
Maximum Hourly Emission Rate (lbs/hr): 5.18 (ink)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1.0357  
MAGLC (ug/m<sup>3</sup>): 292.58
7. 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 (inks, coatings, adhesives, 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,

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- 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

8. 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.

**D. Reporting Requirements**

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (25% VOC by volume of the volatile matter in the coating). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified.
2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:
  - a. a copy of any such record;

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- b. an identification of the probable cause for such deviation; and
  - c. any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
- a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

\*the facility shall include emissions from the following units: K003-K010, P001, and P002.

4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:
- a. the name, title and address of the owner or operator;
  - b. the address (i.e., physical location) of the affected source;
  - c. identification of the applicable emission limitations and compliance date;
  - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
  - e. a brief description of each affected emissions unit, including the type of process operation performed.

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- \* the permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].

**E. Testing Requirements**

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
125.0 lbs VOC / day  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C.
  - b. Emission Limitation:  
22.7 tpy VOC  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:  
  

$$\text{VOC (tpy)} = (\text{summation of Section C.4.c. over the previous 12-month calendar year}) / 2000$$
  - c. Emission Limitation:  
99.0 tons VOC per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.
  - d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.
  - e. Emission Limitation:  
24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:

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Compliance shall be determined based on the recordkeeping specified in Sections C.

- f. **Operational Limitation:**  
VOC content of all coatings shall not exceed 25 % VOC by volume of the volatile matter in the coatings and ink.

**Applicable Compliance Method:**

Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) and 24A (for flexographic and rotogravure printing inks) of 40 CFR, Part 60, Appendix A.

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K003-K010, P001, and P002.

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A., B.1, C.1.-5., D. and E.

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**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,<br/>and/or Equipment</u> | <u>Applicable Rules/Requirements</u>                       | <u>Applicable Emissions<br/>Limitations/Control Measures</u>  |
|---|--|---|
| K009 - Post (74 in. x 50 in.) Folder<br>Gluer     | OAC rule 3745-31-05(A)(3)                                  | Volatile organic compound (VOC) emissions for this emissions unit shall not exceed 6.0 lbs/day and 1.08 tpy* from a combination of inks, coatings, adhesives, and cleanup material for this emission unit . |
|   |  | * as a 12-month rolling summation   |
|   |  | See A.2.c.  |
|   | 40 CFR 63 Subpart KK                                       | The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), 40 CFR 63 Subpart KK and OAC rule 3745-35-07(B).   |
|   | OAC rule 3745-21-09(F)                                     | See A.2.a   |
|   | OAC rule 3745-35-07(B)<br>Synthetic Minor to avoid Title V | VOC content of the coatings employed shall not exceed 2.9 pounds VOC per gallon coating, excluding water and exempt solvents  |
|   |  | Volatile organic compound (VOC)   |

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emissions from the facility\* shall not exceed 99.0 tons per rolling 12-month period.

See A.2.b., B.1 and B.2.

**2. Additional Terms and Conditions**

**2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:

- i. 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; and
- ii. 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.

**2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.

**2.c** The daily and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.

\* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

\*\* the potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

**B. Operational Restrictions**

- 1. The maximum annual volatile organic material usage for the facility\* shall not exceed 99.0 tons,

based upon a rolling 12-month summation of the volatile organic material usage figures.

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

2. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

\* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

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

1. The permittee shall collect and record the VOC content of each coating in pounds VOC per gallon, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons; and

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- f. the actual operation hours for all printing presses combined, in hours per month.
  - \* flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K003, K004, K005, K006, K008, and K010.
  - \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.
3. The permittee shall collect and record the following information each month for the facility\*:
- a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. the individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. the total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup\*\* materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, and subtracting any recovered material\*\* in pounds per month; and
  - h. the rolling, 12-month summation of each individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in

tons.

\* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.

\*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

4. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:

- a. the date the materials from the recovery drum or tank were shipped off site;
- b. the amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;
- c. the average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);
- d. the average VOC content for the recovered cleanup/purge material, in percent by weight; and
- e. the average VOC emissions from the recovered cleanup/purge materials  $[(4.b.) \times (4.d.)]$ , in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as  $[(4.b.) \times (4.c.) \times (4.d.)]$  if the material amount is recorded in gallons.

\* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.

#### D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (2.9 pounds VOC per gallon coating, excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified.

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2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:
  - a. a copy of any such record;
  - b. an identification of the probable cause for such deviation; and
  - c. any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
  
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

\*the facility shall include emissions from the following units: K003-K010, P001, and P002.

4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:
  - a. the name, title and address of the owner or operator;
  - b. the address (i.e., physical location) of the affected source;

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- c. identification of the applicable emission limitations and compliance date;
- d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
- e. a brief description of each affected emissions unit, including the type of process operation performed.
- \* the permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
6.0 lbs VOC / day  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C.
  - b. Emission Limitation:  
1.08 tpy VOC  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:  
  

$$\text{VOC (tpy)} = (\text{summation of Section C.4.c. over the previous 12-month calendar year}) / 2000$$
  - c. Emission Limitation:  
99.0 tons VOC per rolling, 12-month period for this facility\*  
  
Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.
  - d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*

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Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections C.

- e. Emission Limitation:  
24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections C.

- f. Operational Limitation:  
VOC content of all coatings shall not exceed 2.9 pounds VOC per gallon of coating, excluding water and exempt solvents..

Applicable Compliance Method:

Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) and 24A (for flexographic and rotogravure printing inks) of 40 CFR, Part 60, Appendix A.

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K003-K010, P001, and P002.

**F. Miscellaneous Requirements**

1. This Permit to Install replaces PTI No.13-03677, issued August 17, 2000, for this emissions unit.
2. The following terms and conditions are federally enforceable: A., B.1, C.1.-4., D. and E.

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**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,<br/>and/or Equipment</u>   | <u>Applicable Rules/Requirements</u> | Synthetic Minor to avoid Title V |
|---|--------------------------------------|----------------------------------|
| K010 - Ward (66 in. x 113 in.)<br>Rotary Die Cutter | OAC rule 3745-31-05(A)(3)            |                                  |
|   | 40 CFR 63 Subpart KK                 |                                  |
|   | OAC rule 3745-21-09(Y)(1)(a)         |                                  |
|   | OAC rule 3745-35-07(B)               |                                  |

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Applicable Emissions  
Limitations/Control Measures

Volatile organic compound (VOC) emissions for this emissions unit shall not exceed 47.0 lbs/day and 8.49 tpy\* from a combination of inks, coatings, adhesives, and cleanup material for this emission unit .

\* as a 12-month rolling summation

See A.2.c.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), 40 CFR 63 Subpart KK and OAC rule 3745-35-07(B).

See A.2.a

VOC content of the coatings and inks employed shall not exceed twenty-five percent VOC by volume of the volatile matter in the coatings and inks.

Volatile organic compound (VOC) emissions from the facility\* shall not exceed 99.0 tons per rolling 12-month period.

See A.2.b., B.1 and B.2.

## **2. Additional Terms and Conditions**

- 2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:
- i. 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; and
  - ii. 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.
- 2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.
- 2.c** The daily and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.
- \* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002 .
- \*\* the potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

## **B. Operational Restrictions**

1. The maximum annual volatile organic material usage for the facility\* shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

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

2. To ensure enforceability during the first twelve calendar months of operation following the

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issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

- \* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

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

1. The permittee shall collect and record the VOC content of each coating in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
  2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
    - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
    - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
    - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
    - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
    - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons; and
    - f. the actual operation hours for all printing presses combined, in hours per month.
- \* flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K003, K004, K005, K006, K008, and K010.
  - \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or

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pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

3. The permittee shall collect and record the following information each month for the facility\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. the individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. the total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup\*\* materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, and subtracting any recovered material\*\* in pounds per month; and
  - h. the rolling, 12-month summation of each individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in tons.
- \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
- \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for

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recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

4. The permittee shall collect and record the following information for this emission unit each month:
  - a. the actual monthly press operation hours, in hours per month;
  - b. the number of days the press operated during the month;
  - c. the monthly VOC emissions, calculated as [(3.d.) x (most recent product per press allocation factor\*)], in pounds per month; and

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- d. the average daily VOC emissions, calculated as  $[(4.c.) / (4.b.)]$ .
  - \* the 'product per press allocation factor' is calculated following the guidelines outlined in the Printing Industry of Ohio (PIO's) resource document titled "A Self Help Guide to Environmentally Sound Printing Operations" and is based on typical material usage rates and print capacity.
5. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:
- a. the date the materials from the recovery drum or tank were shipped off site;
  - b. the amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;
  - c. the average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);
  - d. the average VOC content for the recovered cleanup/purge material, in percent by weight; and
  - e. the average VOC emissions from the recovered cleanup/purge materials  $[(5.b.) \times (5.d.)]$ , in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as  $[(5.b.) \times (5.c.) \times (5.d.)]$  if the material amount is recorded in gallons.
- \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
6. The permit to install for this emissions unit was evaluated based on the actual 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:

- a. Pollutant: Ammonia  
TLV (mg/m<sup>3</sup>): 17.41  
Maximum Hourly Emission Rate (lbs/hr): 1.94 (ink)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.0087  
MAGLC (ug/m<sup>3</sup>): 414.60
  - b. Pollutant: Isopropyl Alcohol  
TLV (mg/m<sup>3</sup>): 12.29  
Maximum Hourly Emission Rate (lbs/hr): 1.94 (ink)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.3879  
MAGLC (ug/m<sup>3</sup>): 292.58
7. 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 (inks, coatings, adhesives, 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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8. 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.

**D. Reporting Requirements**

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (25% VOC by volume of the volatile matter in the coating). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified.
2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:
  - a. a copy of any such record;
  - b. an identification of the probable cause for such deviation; and
  - c. any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;

- c. an identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

\*the facility shall include emissions from the following units: K003-K010, P001, and P002.

4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:
    - a. the name, title and address of the owner or operator;
    - b. the address (i.e., physical location) of the affected source;
    - c. identification of the applicable emission limitations and compliance date;
    - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
    - e. a brief description of each affected emissions unit, including the type of process operation performed.
- \* the permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
47.0 lbs VOC / day

Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C.

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- b. Emission Limitation:  
8.49 tpy VOC
- Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:
- $$\text{VOC (tpy)} = (\text{summation of Section C.4.c. over the previous 12-month calendar year}) / 2000$$
- c. Emission Limitation:  
99.0 tons VOC per rolling, 12-month period for this facility\*
- Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.
- d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*
- Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.
- e. Emission Limitation:  
24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*
- Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.
- f. Operational Limitation:  
VOC content of all coatings shall not exceed 25 % VOC by volume of the volatile matter in the coatings and ink.
- Applicable Compliance Method:  
Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) and 24A (for flexographic and rotogravure printing inks) of 40 CFR, Part 60, Appendix A.

**Weyerhaeuser Company**  
**PTI Application: 13-03870**  
**Issued**

**Facility ID: 1318043843**

Emissions Unit ID: **K010**

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K003-K010, P001, and P002.

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A., B.1, C.1.-5., D. and E.

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

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

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

| Operations, Property,<br>and/or Equipment   | <u>Applicable Rules/Requirements</u> | 40 CFR 63 Subpart KK      |
|---|--------------------------------------|---------------------------|
| P001 - Corrugator   | OAC rule 3745-31-05(A)(3)            | OAC rule 3745-17-07(A)(1) |
| Terms in this permit supercede those identified in PTI #13-03708 issued 07/11/00. |                                      | OAC rule 3745-17-07(B)(1) |
|   |                                      | OAC rule 3745-17-08       |
|   |                                      | OAC rule 3745-17-11       |
|   |                                      | OAC rule 3745-21-09(F)    |
|   |                                      | OAC rule 3745-35-07(B)    |

Weyer

PTI A

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Synthetic Minor to avoid Title V

Emissions Unit ID: **P001**

Applicable Emissions  
Limitations/Control Measures

Volatile organic compound (VOC) emissions for this emissions unit shall not exceed 90.0 lbs/day and 16.39 tpy\* from a combination of inks, coatings, adhesives and cleanup materials.

\* as a 12-month rolling summation

Particulate emissions (PE) for this emissions unit shall not exceed 2.0 lbs/hour and 8.76 tpy.

The permittee shall employ best available control measures consisting of normal operation and maintenance to minimize or eliminate visible PE of fugitive dust. See section A.2.e.

See section A.2.c., and A.2.d.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), 3745-17-07(B), 3745-17-08, 3745-21-09(F), 40 CFR 63 Subpart KK and 3745-35-07(B).

See A.2.a

Visible particulate stack emissions shall not exceed twenty (20) percent opacity, as a six-minute average.

Visible particulate fugitive emissions shall not exceed twenty (20) percent opacity, as a three-minute average.

The control measure specified by this rule is equivalent to the control measure established pursuant to OAC rule 3745-31-05(A)(3).

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

VOC content of the coatings employed shall not exceed 2.9 pounds VOC per gallon coating, excluding water and exempt solvents

Volatile organic compound (VOC) emissions from the facility\* shall not exceed 99.0 tons per rolling 12-month period. See section B.1

See A.2.b., B.1 and B.2.

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

**2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:

- i. 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; and
- ii. 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.

**2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.

**2.c** The daily and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.

**2.d** The collection efficiency of the capture hood(s) employed in this emissions unit shall be sufficient to minimize or eliminate visible PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

\* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

\*\* the potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

**B. Operational Restrictions**

1. The maximum annual volatile organic material usage for the facility\* shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

**Emissions Unit ID: P001**

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

2. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual individual and combined HAPs material usage records over the previous 12 calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.
3. Particulate emissions from this emissions unit shall be vented to the waste handling system.
  - \* the facility emission, and usage, limits shall include the following units: K003 - K010, P001, and P002.

**Issued: To be entered upon final issuance****C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the VOC content of each coating in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons; and
  - f. the actual operation hours for all printing presses combined, in hours per month.

\* flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K003, K004, K005, K006, K008, and K010.

\*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.
3. The permittee shall collect and record the following information each month for the facility\*:
  - a. the name and identification number of each ink, additive, adhesive, and cleanup material

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- employed;
- b. the weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. the VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. the total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\* in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. the individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. the total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup\*\* materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, and subtracting any recovered material\*\* in pounds per month; and
  - h. the rolling, 12-month summation of each individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in tons.
- \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002.
- \*\* if a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.
4. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:

- a. the date the materials from the recovery drum or tank were shipped off site;
  - b. the amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;
  - c. the average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);
  - d. the average VOC content for the recovered cleanup/purge material, in percent by weight; and
  - e. the average VOC emissions from the recovered cleanup/purge materials  $[(4.b.) \times (4.d.)]$ , in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as  $[(4.b.) \times (4.c.) \times (4.d.)]$  if the material amount is recorded in gallons.
- \* the facility emission, and usage, limits shall include the following units: K003-K010, P001, and P002 .
5. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible stack and fugitive particulate emissions. The presence or absence of any visible stack or fugitive particulate emissions shall be noted in an operations log. If visible stack or fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

The above-mentioned inspections shall be performed during representative, normal operating conditions.

The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality

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(DAQ), modify the above-mentioned inspection frequencies if initial monitoring indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

6. The permit to install for this emissions unit was evaluated based on the actual 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:
  - a. Pollutant: Ethyl Acetate  
TLV (mg/m<sup>3</sup>): 1441.31  
Maximum Hourly Emission Rate (lbs/hr): 3.74 (adhesive)  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 0.0002  
MAGLC (ug/m<sup>3</sup>): 34316.88
7. 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 (inks, coatings, adhesives, 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.).

Emissions Unit ID: **P001**

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

8. 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.

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

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (2.9 pounds VOC per gallon coating, excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified.
2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:
  - a. a copy of any such record;
  - b. an identification of the probable cause for such deviation; and
  - c. any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

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3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

\*the facility shall include emissions from the following units: K003-K010, P001, and P002.

4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:

- a. the name, title and address of the owner or operator;
  - b. the address (i.e., physical location) of the affected source;
  - c. identification of the applicable emission limitations and compliance date;
  - d. a statement of whether the affected emissions unit is located at a major source or at an area source; and
  - e. a brief description of each affected emissions unit, including the type of process operation performed.
- \* the permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].
5. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record that (a) identifies all days during which any visible stack or fugitive particulate emissions were observed from this emissions unit; and (b) describe any corrective actions taken to eliminate the visible stack or fugitive particulate emissions. The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
90.0 lbs VOC / day  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C.
  - b. Emission Limitation:  
16.39 tpy VOC  
  
Applicable Compliance Method:  
Compliance shall be determined based upon the record keeping specified in Section C and the following equation:

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VOC (tpy) = (summation of Section C.4.c. over the previous 12-month calendar year) / 2000

- c. Emission Limitation:  
99.0 tons VOC per rolling, 12-month period for this facility\*
- Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Section C.
- d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*
- Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.
- e. Emission Limitation:  
24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*
- Applicable Compliance Method:  
Compliance shall be determined based on the recordkeeping specified in Sections C.
- f. Operational Limitation:  
VOC content of all coatings shall not exceed 2.9 lbs VOC/gallon, excluding water and exempt solvents.
- Applicable Compliance Method:  
Compliance with the above limitation shall be based on the record keeping specified in section C.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) of 40 CFR, Part 60, Appendix A.
- g. Emission Limitation:  
2.0 lbs PE / hour
- Applicable Compliance Method:  
Compliance with the hourly emission limitations shall be determined by using the following equation:
- $$\text{lbs PE/hr} = [P] * [EF]$$

where,

P = Product produced, in ft<sup>2</sup>/hour

EF = Emission Factor, uncontrolled (lb PE / 1,000 ft<sup>2</sup> Product)\*

\* The current emission factor specified by Weyerhaeuser is 0.006 lbs PE / 1,000 ft<sup>2</sup>. A more recent emission factor determined from stack tests may be used when available.

If required, compliance shall be determined through stack testing in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, and the procedures in OAC rule 3745-17-03(B)(10).

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the appropriate Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

- h. Emission Limitation:  
8.76 tpy PE

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Applicable Compliance Method:

The annual limit is based on the allowable hourly emission limit (2.00 lb PE/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- i. Emission Limitation:  
Visible stack particulate emissions shall not exceed twenty (20) percent opacity, as a six-minute average.

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## Applicable Compliance Method:

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

- j. Emission Limitation:  
Visible fugitive particulate emissions shall not exceed twenty (20) percent opacity, as a three-minute average.

## Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K003-K010, P001, and P002 .

**F. Miscellaneous Requirements**

1. This Permit to Install replaces PTI No.13-03708, issued July 11, 2000, for this emissions unit.
2. The following terms and conditions are federally enforceable: A., B.1, C.1.-5., D. and E.

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

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

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

| Operations, Property,<br>and/or Equipment | <u>Applicable Rules/Requirements</u> | OAC rule 3745-17-11 |
|---|--------------------------------------|---------------------|
| P002 - Bobst Platen Die Cutter            | OAC rule 3745-31-05(A)(3)            |                     |
|   | OAC rule 3745-17-07(A)               |                     |
|   | OAC rule 3745-17-07(B)               |                     |
|   | OAC rule 3745-17-08                  |                     |

Applicable Emissions  
Limitations/Control Measures

Particulate emissions (PE) for this emissions unit shall not exceed 2.42 tpy.

The permittee shall employ best available control measures consisting of normal operation and maintenance to minimize or eliminate visible PE of fugitive dust. See section A.2.a.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), 3745-17-07(B), and 3745-17-11.

Visible particulate emissions shall not exceed twenty (20) percent opacity, as a six-minute average.

Visible particulate emissions shall not exceed twenty (20) percent opacity, as a three-minute average.

The control measure specified by this rule is equivalent to the control measure established pursuant to OAC rule 3745-31-05(A)(3). See section A.2.a.

0.551 lb PE/hr

## **2. Additional Terms and Conditions**

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- 2.a The collection efficiency of the capture hood(s) employed in this emissions unit shall be sufficient to minimize or eliminate visible PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

**B. Operational Restrictions**

1. Particulate emissions from this emissions unit shall be vented to the waste handling system.

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

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when weather conditions allow, for any visible stack and fugitive particulate emissions. The presence or absence of any visible stack or fugitive emissions shall be noted in an operations log. If visible fugitive or stack particulate emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

The above-mentioned inspections shall be performed during representative, normal operating conditions.

The permittee may, upon receipt of written approval from the Cleveland Division of Air Quality (Cleveland DAQ), modify the above-mentioned inspection frequencies if initial monitoring indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**D. Reporting Requirements**

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record that (a) identifies all days during which any visible stack or fugitive particulate emissions were observed from this emissions unit; and (b) describe any corrective actions taken to

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eliminate the visible stack or fugitive particulate emissions. The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) and operational restriction specified in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
0.551 lb PE / hour

Applicable Compliance Method:

Compliance with the hourly emission limitations shall be determined by using the following equation:

$$\text{lb PE/hr} = [W] * [EF]$$

where,

W = Waste Generated, in ton/hour

EF = Emission Factor, controlled (lb PE / 1 ton Waste Generated)\*

- \* The current emission factor specified by Weyerhaeuser is 0.791 lbs PE / 1 ton of waste generated. A more recent emission factor determined from stack tests may be used when available.

If required, compliance shall be determined through stack testing in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A, and the procedures in OAC rule 3745-17-03(B)(10).

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating

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parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Cleveland DAQ's refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Cleveland DAQ.

- b. Emission Limitation:  
2.42 tpy PE

Applicable Compliance Method:

The annual limit is based on the allowable hourly emission limit (2.00 lb PE/hr) multiplied by the maximum possible operating hours (8,760 hr/yr), and divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation:  
Visible stack particulate emissions shall not exceed twenty (20) percent opacity, as a six-minute average.

Applicable Compliance Method:

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

- d. Emission Limitation:  
Visible fugitive particulate emissions shall not exceed twenty (20) percent opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9 and the

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procedures specified in OAC rule 3745-17-03(B)(3).

**F. Miscellaneous Requirements**

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