



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04643

Fac ID: 1318118369

DATE: 12/12/2006

All Foils, Incorporated
Mike Fienberg
4597 Van Epps Road
Brooklyn Heights, OH 44131

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

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

CC: USEPA

CLAA



**Permit To Install
Terms and Conditions**

**Issue Date: 12/12/2006
Effective Date: 12/12/2006**

FINAL PERMIT TO INSTALL 13-04643

Application Number: 13-04643
Facility ID: 1318118369
Permit Fee: **\$200**
Name of Facility: All Foils, Incorporated
Person to Contact: Mike Fienberg
Address: 4597 Van Epps Road
Brooklyn Heights, OH 44131

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4597 Van Epps Road
Brooklyn Heights, Ohio**

Description of proposed emissions unit(s):
Rotogravure/flexographic printing line for metal and plastic substrates -- K001.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

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 (i.e., postmarked) quarterly 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

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

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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

Emissions Unit ID: K001

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (includes coating and cleanup material)	94.9
Single HAP	9.9
Combined HAPs	24.9

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 Rotogravure/flexographic printing line for thin gauge (foil) metal, plastic substrates, and pressure sensitive tapes and labels.	- OAC rule 3745-31-05(A)(3)	154.5 lbs/hour and volatile organic compounds for group 1 coatings 97.5 lbs/hour volatile organic compounds for group 2 coatings See Section A.2.a below.
Modified	OAC rule 3745-21-09(Y)	The requirements of this rule include compliance with the requirements of OAC rule 3745-35-07
The terms and conditions in this permit supercede the terms and conditions contained in PTI 13-04079 issued on May 25, 2004.	OAC rule 3745-35-07 (Synthetic Minor to avoid Title V)	Exempt; see Section A.2.b below. 25.8 tons VOC/rolling 12-months for Group 1 coatings; 58.5 tons VOC/rolling 12-months for Group 2 coatings; 10.6 tons VOC/rolling 12-months for cleanup; and 9.9 tons any single HAP and 24.9 tons for total combined HAPs per rolling, 12-month period All limits above are based on a

rolling, 12-month summations
of material usage rates.

See Section B.1, B.2 and B.3.

2. Additional Terms and Conditions

- 2.a** The pound per hour emission limits were established at potential to emit; therefore, monitoring, record keeping and reporting are not required to determine compliance with these limits.
- 2.b** The requirements of OAC rule 3745-21-09(Y) do not apply to any printing line which is located at a facility in which the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than or equal to one hundred tons per year. This emissions unit (K001) is limited to 94.9 tons VOC/rolling 12-months and is the only printing line at this facility; therefore, OAC 3745-21-09(Y) does not apply to this emissions unit .

B. Operational Restrictions

- 1. Group 1 coatings - this group includes coatings that have a VOC content over 6.5 lbs VOC/gallon up to but not exceeding 10.3 lbs VOC/gallon as applied. The maximum annual usage rate in this emissions unit shall not exceed 5,000 gallons per year, based upon a rolling 12 - month summation of the coating usage rates.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	1400
1-2	1500
1-3	1600
1-4	1700
1-5	2100
1-6	2520
1-7	2940

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1-8	3360
1-9	3780
1-10	4200
1-11	4620
1-12	5000

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

- Group 2 coatings - this group includes coatings that have a VOC content up to but not exceeding 6.5 lbs VOC/gallon as applied. The maximum annual usage rate in this emissions unit shall not exceed 18,000 gallons per year, based upon a rolling 12 - month summation of the coating usage rates.

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

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	4500
1-2	5000
1-3	5500
1-4	6000
1-5	7500
1-6	9000
1-7	10500
1-8	12000
1-9	13500
1-10	15000
1-11	16500
1-12	18000

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

- 3. Cleanup material - the maximum annual usage rate in this emissions unit, shall not exceed 3,120 gallons per year, based upon a rolling 12-month summation of the cleanup usage rates.

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

<u>Month</u>	<u>Maximum Allowable Cumulative cleanup Usage</u>
1	780
1-2	880
1-3	980
1-4	1040
1-5	1300
1-6	1560
1-7	1820
1-8	2080
1-9	2340
1-10	2600
1-11	2860
1-12	3120

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

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for the printing line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the volume, in gallons, of each coating in group 1 employed;
 - c. the volume, in gallons, of each coating in group 2 employed;

- d. the volume, in gallons, of clean-up material employed;
 - e. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - f. the single HAP content of each coating and cleanup material, in pounds per gallon, as applied;
 - g. the combined HAP content of each coating and cleanup material, in pounds per gallon, as applied;
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds $(b*e) + (c*e) + (d*e)$;
 - i. the total single HAP emissions from all coatings and cleanup materials employed, in pounds $(b*f) + (c*f) + (d*f)$;
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds $(b*g) + (c*g) + (d*g)$;
2. The permittee shall maintain monthly records of the following information:
- a. The coating usage rate for Group 1, Group 2 and cleanup usage rate for each month in gallons; and,
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage rates for Group 1, Group 2 and the cleanup usage rates in gallons.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for Group 1, Group 2 and the cleanup usage rate for each calendar month.

3. The permittee shall collect and record the total VOC, single HAP, and combined HAP emissions from all coatings and cleanup materials employed, in tons, calculated from the monthly records in section C.1 above, for this emissions unit for the purpose of determining annual VOC, single HAP, and combined HAP emissions based on a rolling, 12-month summation of emissions.
4. The permit to install for this emissions unit K001 was evaluated based on the actual

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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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 54.0 lbs Toluene/hour

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3900 ug/m³

MAGLC (ug/m³): 4485.83 ug/m³

Pollutant: Methyl Ethyl Ketone (MEK)

TLV (mg/m³): 589.76

Maximum Hourly Emission Rate (lbs/hr): 35.34 lbs MEK/hour

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2552.51 ug/m³

MAGLC (ug/m³): 14,041.90 ug/m³

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would

result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 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) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the 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 submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage rate limitations in Section B.1, B.2, and B.3 and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage limits. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
2. The permittee shall notify CDAQ in writing if the calculated yearly VOC emission rate

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from K001 due to coating usage exceeds the allowable yearly emissions limitation of 25.8 tons VOC/rolling 12-months for group 1 and/or 58.5 tons VOC/rolling 12-months for Group 2. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.

3. The permittee shall notify CDAQ in writing if the calculated yearly VOC cleanup material emission rate from K001 exceeds the allowable yearly emissions limitation of 10.6 tons VOC/rolling 12-months. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
4. The permittee shall notify CDAQ in writing if the calculated yearly single HAP or combined HAPs emission rate from K001 that exceeds the allowable yearly emissions limitation of 9.9 tons/rolling 12-months and 24.9 tons/rolling 12-months respectively. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.

E. Testing Requirements

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

- a. Emission Limitation

154.5 lbs VOC/hour for Group 1 coatings

Applicable Compliance Method

The pound per hour limit is the maximum potential to emit for this emissions unit determined from the worst case coating as follows: 15.00 gals/hr x 10.3 lbs VOC/gal = 154.5 lbs VOC/hr.

If required, compliance shall be determined by performing a stack test using USEPA test method 25 or 25A as appropriate based on the VOC concentration in the stack.

- b. Emission Limitation

97.5 lbs VOC/hour for Group 2 coatings

Applicable Compliance Method

The pound per hour limit is the maximum potential to emit for this emissions unit determined from the worst case coating as follows: 15.00 gals/hr x 6.5 lbs VOC/gal = 97.5 lbs VOC/hr.

If required, compliance shall be determined by performing a stack test using USEPA test method 25 or 25A as appropriate based on the VOC concentration in the stack.

c. Emission Limitation

25.8 tons VOC/rolling 12-months from Group 1 Coatings
58.5 tons VOC/rolling 12-months from Group 2 Coatings
10.6 tons VOC/rolling 12-months from cleanup material
Based on rolling 12-month summations of material usage.

Applicable Compliance Method

Compliance shall be determined based on the record keeping requirements from C.1, C.2, and C.3 above.

d. Emission Limitation

9.9 tons/rolling 12-months any single HAP (coatings and cleanup) based on rolling, 12-month summation of material usage.

Applicable Compliance Method

Compliance with the limitations shall be demonstrated by the monitoring and recordkeeping requirements of section C above.

e. Emission Limitation

24.9 tons/rolling 12-months total combined HAPs (coatings and cleanup) based on rolling, 12-month summation of material usage.

Applicable Compliance Method

Compliance with the limitations shall be demonstrated by the monitoring and recordkeeping requirements of section C above.

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F. Miscellaneous Requirements

None.