



State of Ohio Environmental Protection Agency

**RE: FINAL 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: 13-04026

DATE: 3/13/2003

Automated Packaging -- Garfield Facility
Paul Banfield
13555 McCracken Road
Garfield Heights, OH 44125

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CBAPC



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 3/13/2003
Effective Date: 3/13/2003**

FINAL PERMIT TO INSTALL 13-04026

Application Number: 13-04026
APS Premise Number: 1318226136
Permit Fee: **\$400**
Name of Facility: Automated Packaging -- Garfield Facility
Person to Contact: Paul Banfield
Address: 13555 McCracken Road
Garfield Heights, OH 44125

Location of proposed air contaminant source(s) [emissions unit(s)]:
13555 McCracken Road
Garfield Heights, Ohio

Description of proposed emissions unit(s):
Modification of flexographic printing presses for polyethylene film printing.

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. State and Federally Enforceable Permit To Install General Terms and Conditions****1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. Permit Transfers

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.

4. 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.

5. Construction of New Sources(s)

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

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

Automated Packaging -- Garfield Facility

PTI Application: **13-04026**

Issued: 3/13/2003

Facility ID: **1318226136**

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.

Issued

Emissions Unit ID: K012

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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)

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	34.26
Facility wide Single HAP	9.9
Facility Wide Combined HAP	24.0

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Automated Packaging -- Garfield Facility

PTI Application: **13-04026**

Issued: 3/13/2003

Facility ID: **1318226136**

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Autom

PTI A₁

Issued: 3/13/2003

Emissions Unit ID: K012

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

I. Applicable Emissions Limitations and/or Control Requirements

1. Emissions from this facility shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table:

<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
OAC rule 3745-31-05 (D)	9.9 tons of any single hazardous air pollutant as a rolling 12-month summation for the entire facility (Synthetic minor to avoid Maximum Achievable Control Technology requirements).
OAC rule 3745-31-05 (D) (to avoid MACT)	24.0 tons of combined hazardous air pollutants as a rolling 12-month summation for the entire facility (Synthetic minor to avoid Maximum Achievable Control Technology requirements).

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

Issued: 3/13/2003

- The maximum annual HAP material usage limitations for the facility shall not exceed those specified by the formula listed below, based on a rolling 12-month summation.

$$\sum_{i=1}^x \text{VOL} \times \text{D} \times \% \text{HAP} \times (1 \text{ ton}/2000 \text{ pounds}) \times (1 - \text{CE} \times \text{DE}) = \text{Ehap}$$

Where:

- VOL = coating and cleanup material usage, gallons/month
- D = Density of the material, pounds/gal
- %HAP = % by weight of the single or total HAP in the material
- CE = capture efficiency by weight
- DE = destruction efficiency by weight
- Ehap = HAP emissions in tons/month

The permittee shall document the monthly HAP material usage by tracking the monthly coating and cleanup material usage for each press at the facility with the density of each material, the HAP content, the emission capture efficiency by weight, and the emission control efficiency by weight, to calculate total monthly actual HAP emissions generated by the facility.

The maximum annual HAP material usage rates* (from coatings and cleanup) for the facility shall not exceed 9.9 tons per year of any single HAP and 24 tons per year of combined HAPs, based on a rolling, 12-month basis.

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

Month	Maximum Allowable Cumulative Emissions of:		Combi ned HAP's (Tons)
	Single HAP (Tons)		
1	0.83	2.0	
1-2	1.65	4.0	
1-3	2.48	6.0	
1-4	3.30	8.0	

Issued

Emissions Unit ID: K012

1-5	4.13	10.0
1-6	4.95	12.0
1-7	5.78	14.0
1-8	6.60	16.0
1-9	7.43	18.0
1-10	8.25	20.0
1-11	9.08	22.0
1-12	9.90	24.0

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the HAP material used is emitted.

2. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP material usage limitations shall be based upon the rolling 12-month summations of the material usage of single and combined HAPs.

Issued: 3/13/2003

Single HAP material usage		
Current month	Previous 11 months	Total 12-month
Tons of single HAP	+ tons of single HAP	< = 9.9 tons of single HAP

Combined HAP's material usage		
Current month	Previous 11 months	Total 12-month
Tons of combined HAP's	+ tons of combined HAP's	< = 24.0 tons of combined HAP's

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The single and combined HAP material usage rate for each month.
 - b. Beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the single and combined HAP material usage rates.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative single and combined HAP material usage rates for each calendar month.

2. The permittee shall keep and maintain monthly records of single HAP material usage and combined HAP's material usage on a rolling 12-month basis after the first 12 calendar months of operation following the issuance of this permit:

Single HAP material usage		
Current month	Previous 11 months	Total
	12-month	
Tons of single HAP	+ tons of single HAP	= tons of
	single HAP	

Combined HAP's material usage		
Current month	Previous 11 months	Total
	12-month	
Tons of combined HAP's	+ tons of combined HAP's	= tons
	of combined HAP's	

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month allowable cumulative single and combined HAP material usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

IV. Testing Requirements

1. Compliance with the emission limitation(s) in Part II section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limit
9.9 tons per rolling, 12-month period for any single HAP for the entire facility.

Applicable Compliance Method
Compliance shall be determined in accordance with the recordkeeping from section A.III.
 - b. Emission Limit
24 tons per rolling, 12 month period for combined HAPs for the entire facility.

Applicable Compliance Method
Compliance shall be determined in accordance with the recordkeeping from section A.III.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
K012 - Flexographic printing presses for polyethylene film printing with natural gas drying ovens, and controlled by a RTO (Regenerative Thermal Oxidizer).	OAC rule 3745-31-05 (A)(3)	6.23 lbs VOC/hr(stack); 15.58 lbs VOC/hr(fugitive); See A.I.2.a. below.
	OAC rule 3745-31-05 (D) (To establish facility as minor for PSD)	34.26 tons per year of VOC for K012 and K013, as a rolling 12- month summation (Synthetic minor to avoid Prevention of Significant Deterioration).
Terms in this permit supercede those identified in PTI 13-2946 issued 3/29/95.	OAC rule 3745-21-09 (Y)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a Maintain and operate two regenerative thermal oxidizers (RTO) operating in tandem as follows:
 - i. The permittee shall employ a capture system which shall capture not less than 80%, by weight, of all VOC emissions from this emission unit.
 - ii. The permittee shall employ a control system which shall control not less than 90%,

by weight, of the VOC emissions captured.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

2. The maximum annual VOC material usage rates* (from coatings and cleanup) for this emissions unit combined with K013 shall not exceed 34.26 tons VOC per year, based upon a rolling, 12-month summation of the VOC material usage figures.

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

Month	Maximum Allowable Cumulative Material Usage of VOC, (Tons)
1	2.86
1 -2	5.7
1 -3	8.6
1 -4	11.4
1 -5	14.3
1 -6	17.1
1 -7	20.0
1 -8	22.9
1 -9	25.8
1 -10	28.6
1 -11	31.5
1 -12	34.3

* For the purpose of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC material usage limitations shall be based upon the rolling 12-month summations of the material usage of VOC for K012 and K013 combined.

Current month	Previous 11 months	Total 12-month
Tons of VOC	+ tons of VOC	<= 34.26 tons of VOC

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emission unit.
2. The permittee shall operate and maintain continuous temperature monitors and a recorder which measure and record the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. The permittee shall collect and record the following information each day for the control equipment when this emissions unit is in operation:
 - a. A log of downtime time for the capture system, control device, and monitoring equipment, while the associated emissions unit was in operation.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature within the thermal oxidizer, was 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
4. The permittee shall collect and record the following information for each month the emissions unit is in operation:
 - a. The operating hours for each month.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the operating hours.
 - c. Also during the first 12 calendar month of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.
5. The permittee shall collect and record the following information for each month the emissions unit is in operation:
 - a. The name and identification number of each coating, as applied;
 - b. The VOC content of each coating, as applied, in pounds per gallon;

- c. The number of gallons of each coating employed;
- d. The name and identification number of each cleanup material employed;
- e. The VOC content of each cleanup material, in pounds per gallon;
- f. The number of gallons of each cleanup material employed;
- g. The number of hours of operation for each month;
- h. The total controlled VOC emissions from all coatings and cleanup materials employed, in tons per month determined in accordance with section A.V.1.b.
- i. The actual controlled rolling, 12 month VOC emission rates for all coatings and cleanup materials in tons per year determined in accordance with section A.V.1.b.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative coating usage rate and emission limitations for each calendar month.

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit written quarterly deviation (excursion) reports to the Cleveland DAQ of any daily record showing down time of the capture (collection) system, control device, monitoring equipment of the associated emissions unit when the emission unit was in operation. If no such instances have occurred during a particular quarter, a written quarterly report stating this shall be submitted.
3. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
4. The permittee shall submit written quarterly deviation (excursion) reports to the Cleveland DAQ that identify each month during which the controlled average hourly emissions of VOC exceeded the limit in Part III, Sections A.I.1.

5. These written quarterly reports shall be submitted to the Cleveland DAQ by January 31, April 30, July 31 and October 31 and shall cover the records of the previous calendar quarter.
6. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify all exceedances of the rolling, 12-month VOC material usage limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative VOC material usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

V. Testing Requirements

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

- a. Emission Limitation:
6.23 lbs VOC/hr and 15.58 lbs VOC/hr (fugitive)

Applicable Compliance Method

Compliance shall be determined using Method 25 or 25A from 40 CFR Part 60.

- b. Emission limitation:

34.26 Tons VOC per rolling, 12 month period (combined total for K012 and K013)

Applicable Compliance Method:

Calculation of the monthly and rolling 12-month emissions using the amount of coatings used and cleanup materials employed using the following equation to determine monthly emissions:

$$\sum_{i=1}^x \text{VOL} \times \text{VOC} \times (1 \text{ ton}/2000 \text{ pounds}) \times (1 - \text{CE} \times \text{DE}) = \text{Evoc}$$

where:

VOL = coating and cleanup material usage, gallons/month

VOC = organic material content, pounds VOC/gallon of coating and/or cleanup material

CE = capture efficiency by weight (As determined from the most recent performance test)

DE = destruction efficiency by weight (As determined from the most recent performance test)

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Evoc = VOC emissions in tons/month

See Part III, Special Terms and Conditions for Specific Emissions Unit(s), Sections A.II for VOC rolling, 12 month emission calculation.

- c. U.S. EPA Method 24 and 24A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer or supplier.
- d. Emission Limitation:
Minimum VOC emission capture efficiency of 80%, by weight and minimum VOC emission destruction efficiency of 90%, by weight.

Applicable Compliance Method:

Performance testing in accordance with OAC rule 3745-21-10 (C).

- 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a.. The emission testing shall be conducted within 12 months after the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC, and the capture and control efficiency limitations for VOC. The emission testing shall also be conducted to establish the average temperature within the thermal oxidizer..
 - c. The following test methods shall be employed to demonstrate compliance with the overall emission control efficiency limitation for VOC:
 - i. U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are 50 ppm or greater; or
 - ii. U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The tests 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).
 - e. The emission capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an

alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

- f. The emission control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 (C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

Personnel from the Cleveland DAQ shall be permitted to witness the tests, 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 tests 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 tests.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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>
K012 - Flexographic printing presses for polyethylene film printing with natural gas drying ovens.	None.	None.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
K013 - Flexographic printing presses for polyethylene film printing with natural gas drying ovens, and controlled by RTO (Regenerative Thermal Oxidizer).	OAC rule 3745-31-05 (A)(3)	5.0 lbs VOC/hr (stack); 12.46 lbs VOC/hr (fugitive); See A.I.2.a below.
Terms in this permit supercede those identified in PTI 13-2946 issued 3/29/95.	OAC rule 3745-31-05 (D) (To establish facility as a minor for PSD)	34.26 tons per year of VOC for K012 and K013, as a rolling 12-month summation (Synthetic minor to avoid Prevention of Significant Deterioration).
	OAC rule 3745-21-09 (Y)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A) (3)

2. Additional Terms and Conditions

- 2.a Maintain and operate a two regenerative thermal oxidizers (RTO), operating in tandem, as follows:

- i. The permittee shall employ a capture system which shall capture not less than

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80%, by weight, of all VOC emissions from this emission unit.

- ii. The permittee shall employ a control system which shall control not less than 90%, by weight, of the VOC emissions captured.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum annual VOC material usage rates for this emissions unit combined with K012 shall not exceed 34.26 tons VOC per year, based upon a rolling, 12-month summation of the VOC material usage figures.

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

Month	Maximum Allowable Cumulative Material Usage of VOC, (Tons)
1	2.86
1 -2	5.7
1 -3	8.6
1 -4	11.4
1 -5	14.3
1 -6	17.1
1 -7	20.0
1 -8	22.9
1 -9	25.8
1 -10	28.6
1 -11	31.5
1 -12	34.3

- * For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based upon the rolling, 12-month summations of the material usage of VOC for K012 and K013 combined..

Current month	Previous 11 months	Total 12-month
Tons of VOC	+ tons of VOC	<= 34.26 tons of VOC

III. Monitoring and/or Recordkeeping Requirements

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1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emission unit.
2. The permittee shall operate and maintain continuous temperature monitors and a recorder which measure and record the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. The permittee shall collect and record the following information each day for the control equipment when this emissions unit is in operation:
 - a. A log of downtime time for the capture system, control device, and monitoring equipment, while the associated emissions unit was in operation.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature within the thermal oxidizer, was 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
4. The permittee shall collect and record the following information for each month the emissions unit is in operation:
 - a. The operating hours for each month.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the operating hours.
 - c. Also during the first 12 calendar month of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.
5. The permittee shall collect and record the following information for each month the emissions unit is in operation:
 - a. The name and identification number of each coating, as applied;
 - b. The VOC content of each coating, as applied, in pounds per gallon;
 - c. The number of gallons of each coating employed;
 - d. The name and identification number of each cleanup material employed;
 - e. The VOC content of each cleanup material, in pounds per gallon;

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- f. The number of gallons of each cleanup material employed;
- g. The number of hours of operation for each month;
- h. The total controlled VOC emissions from all coatings and cleanup materials employed, in tons per month determined in accordance with section A.V.1.b.
- i. The actual controlled rolling, 12-month VOC emission rates for all coatings and cleanup materials in tons per year determined in accordance with section A.V.1.b.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative production rate and emission limitations for each calendar month.

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Cleveland Division of Air Quality (Cleveland DAQ) that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit written quarterly deviation (excursion) reports to the Cleveland DAQ of any daily record showing down time of the capture (collection) system, control device, or monitoring equipment of the associated emissions unit when the emission unit was in operation. If no such instances have occurred during a particular quarter, a written quarterly report stating this shall be submitted.
3. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
4. The permittee shall submit written quarterly deviation (excursion) reports to the Cleveland DAQ that identify each month during which the controlled average hourly emissions of VOC exceeded the limit in Part III, Section A.I.1 for this emissions unit.
5. These written quarterly reports shall be submitted to the Cleveland DAQ by January 31, April 30,

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July 31 and October 31 and shall cover the records of the previous calendar quarter.

6. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ that identify all exceedances of the rolling, 12-month VOC material usage limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative material usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation
5 lbs VOC/hr (stack) and 12.48 lbs VOC/hr (fugitive)

Applicable compliance Method
Compliance shall be determined using test methods 25 or 25A from 40 CFR Part 60.
 - b. Emission Limitation

34.26 Tons VOC per rolling, 12 month period (combined total for K012 and K013)

Applicable Compliance Method:
Calculation of the monthly and rolling 12-month emissions using records of amount of the coatings used and cleanup materials employed using the following equation to determine monthly emissions:

$$\sum_{i=1}^x \text{VOL} \times \text{VOC} \times (1 \text{ ton}/2000 \text{ pounds}) \times (1 - \text{CE} \times \text{DE}) = \text{Evoc}$$

where:
 VOL = coating and cleanup material usage, gallons/month
 VOC = organic material content, pounds VOC/gallon of coating and/or cleanup material
 CE = capture efficiency by weight (as determined from the most recent performance test)
 DE = destruction efficiency by weight (as determined from the most recent performance test)
 Evoc = VOC emissions in tons/month

 See Part III, Special Terms and Conditions for Specific Emissions Unit(s), Sections A.II for rolling, 12 month VOC emission calculation.
 - c. U.S. EPA Method 24 and 24A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC contents of the coatings as received from the manufacturer or supplier.

- d. Emission Limitation:
Minimum VOC emission capture efficiency of 80%, by weight and minimum VOC emission destruction efficiency of 90%, by weight.

Applicable Compliance Method:

Performance testing in accordance with OAC rule 3745-21-10 (C).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted 12 months after the issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC, and the capture and control efficiency limitations for VOC. The emission testing shall also be conducted to establish the average temperature within the thermal oxidizer.
- c. The following test methods shall be employed to demonstrate compliance with the overall emission control efficiency limitation for VOC.
- i. U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are 50 ppm or greater; or
- ii. U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and
- Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The tests 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).
- e. The emission capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9,

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1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

- f. The emission control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 (C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

3. Personnel from the Cleveland DAQ shall be permitted to witness the tests, 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.
4. A comprehensive written report on the results of the emissions tests 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 tests.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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>
K013 - Flexographic printing presses for polyethylene film printing with natural gas drying ovens.	None.	None.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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None