



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
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: 13-04141**

**DATE: 7/13/2004**

Blue Ridge Paper Products Inc  
M. Barry Makofsky  
7920 Mapelway Drive  
Cleveland, OH 44138

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

CLAA



Permit To Install  
Terms and Conditions

Issue Date: 7/13/2004  
Effective Date: 7/13/2004

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-04141**

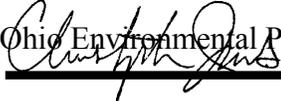
Application Number: 13-04141  
APS Premise Number: 1318411812  
Permit Fee: **\$0**  
Name of Facility: Blue Ridge Paper Products Inc  
Person to Contact: M. Barry Makofsky  
Address: 7920 Mapelway Drive  
Cleveland, OH 44138

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**7920 Mapelway Drive**  
**Olmsted Falls, Ohio**

Description of proposed emissions unit(s):  
**PTI modification issued on 2/26/04 did not contain the updated terms. The purpose of this PTI modification is to include the terms that should had been included in the 2/26/04 issued PTI.**

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

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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

**Blue Ridge Paper Products Inc**  
**PTI Application: 13-04141**  
**Modification Issued: 7/13/2004**

**Facility ID: 1318411812**

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**

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.

**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	30.1

**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>
K010 - No. 10 Printer/Cutter Line - Web-fed flexographic printer with (8) flexographic ink printing stations, and (3) rotary adhesive stations	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 3.07 lbs/hr and 13.45 tons per year (tpy) from adhesive.
Modified		Volatile organic compound (VOC) emissions from cleanup shall not exceed 0.42 ton per year (tpy).
This terms and conditions of this permit supercede the terms and conditions in PTI #13-04141 issued on 6/27/2003.		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a).
	OAC rule 3745-21-09(Y)(1)(a)(i) or (ii)	See A.2.a below.  VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, or 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

**2. Additional Terms and Conditions**

- 2.a The hourly and annual allowable emission limit has been set at the emission unit's potential to emit (PTE), therefore no record keeping or reporting is required for this limitation.

**B. Operational Restrictions**

None.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for the K010 line:
  - a. the name and identification number of each coating/ink, cleanup material, and adhesive material employed;
  - b. the VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,5}$ ]; and,
  - c. the VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,6}$ ].

(If the permittee mixes complying coatings at the line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the amount of cleanup, in pounds, employed on a yearly basis.

**D. Reporting Requirements**

1. The permittee shall notify the Cleveland Division of Air Quality in writing if at any time the coating employed on K010 exceeds the 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, and 25 percent VOC by volume of the volatile matter in the coating and ink. The notification shall include a copy of such record and shall be sent to the Cleveland Division of Air Quality within 30 days following the end of the calendar month.

**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 methods:
  - a. Emission Limitation:  
VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvent, or 25 percent VOC by volume of the

volatile matter of the coating and ink, as applied.

**Applicable Compliance Method:**

Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot

be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

b. **Emission Limitations:**

VOC emissions shall not exceed 3.07 lbs/hr including adhesive materials.

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be demonstrated with total ink and adhesive usage and worst case VOC content of the ink and adhesive. The maximum hourly emission rate was determined from the maximum coating and adhesive usage rates as follows:

**coating:**

$$(\text{lbs coat/hr}) \times (\% \text{ VOC by weight}) = (16.72 \text{ lbs/hr}) \times (15.84 \text{ lbs VOC}/100 \text{ lbs coat}) = 2.65 \text{ lbs VOC/hr}$$

**abhesive:**

$$(\text{lbs abhesive/hr}) \times (\% \text{ VOC by weight}) = (2.39 \text{ lbs/hr}) \times (17.7 \text{ lbs VOC}/100 \text{ lbs abhesive}) = 0.423 \text{ lb VOC/hr}$$

$$\text{Total} = \text{coating} + \text{adhesive} = 2.65 + 0.42 = 3.07 \text{ lbs VOC/hr}$$

c. **Emission Limitations:**

VOC emissions shall not exceed 13.45 tons per year including adhesive materials.

**Applicable Compliance Method:**

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

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**Modif**

**Facility ID: 1318411812**

Emissions Unit ID: **K010**

- d. Emission Limitations;  
VOC emissions from cleanup shall not exceed 0.42 ton per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated with total cleanup usage and worst case VOC content of the cleanup. The maximum annual emission rate was determined from the maximum cleanup usage rates as follows:

$$\frac{(\text{lbs cleanup/yr}) \times (\% \text{VOC by weight})}{(2,000 \text{ lbs/ ton})} = \frac{(5,317 \text{ lbs/yr}) \times (15.9 \text{ lbs VOC/ } 100 \text{ lbs cleanup})}{2,000 \text{ lbs/ ton}} = 0.42 \text{ tpy}$$

#### **F. Miscellaneous Requirements**

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.

**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>
K011 - No. 11 Printer/Cutter Line - Web-fed flexographic printer with (8) flexographic ink printing stations, and (3) rotary adhesive stations	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 3.40 lbs/hr and 14.89 tons per year (tpy) including adhesive.
Modified		Volatile organic compound (VOC) emissions from cleanup shall not exceed 1.32 tons per year (tpy).
This terms and conditions of this permit supercede the terms and conditions in PTI #13-04141 issued on 6/27/2003.		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a).
	OAC rule 3745-21-09(Y)(1)(a)(i) or (ii)	See A.2.a below.
		VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, or 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

**2. Additional Terms and Conditions**

**Blue F**

**PTI A**

**Modification Issued: 7/13/2004**

Emissions Unit ID: **K011**

- 2.a** The hourly and annual allowable emission limit has been set at the emission unit's potential to emit (PTE), therefore no record keeping or reporting is required for this limitation.

**B. Operational Restrictions**

None.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for the K011 line:
  - a. the name and identification number of each coating/ink, cleanup material, and adhesive material employed;
  - b. the VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,5}$ ]; and,
  - c. the VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,6}$ ].

(If the permittee mixes complying coatings at the line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the amount of cleanup, in pounds, employed on a yearly basis.

**D. Reporting Requirements**

1. The permittee shall notify the Cleveland Division of Air Quality in writing if at any time the coating employed on K011 exceeds the 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, and 25 percent VOC by volume of the volatile matter in the coating and ink. The notification shall include a copy of such record and shall be sent to the Cleveland Division of Air Quality within 30 days following the end of the calendar month.

**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 methods:
  - a. Emission Limitation:  
VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvent, or 25 percent VOC by volume of the

volatile matter of the coating and ink, as applied.

**Applicable Compliance Method:**

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

b. **Emission Limitations:**

VOC emissions shall not exceed 3.40 lbs/hr including adhesive materials.

**Applicable Compliance Method:**

Compliance with the hourly emission limitation shall be demonstrated with total ink and adhesive usage and worst case VOC content of the ink and adhesive. The maximum hourly emission rate was determined from the maximum coating and adhesive usage rates as follows:

**coating:**

$$(\text{lbs coat/hr}) \times (\% \text{ VOC by weight}) = (13.1 \text{ lbs/hr}) \times (15.84 \text{ lbs VOC}/100 \text{ lbs coat}) = 2.08 \text{ lbs VOC/hr}$$

**adhesive:**

$$(\text{lbs adhesive/hr}) \times (\% \text{ VOC by weight}) = (7.48 \text{ lbs/hr}) \times (17.7 \text{ lbs VOC}/100 \text{ lbs adhesive}) = 1.32 \text{ lbs VOC/hr}$$

$$\text{Total} = \text{coating} + \text{adhesive} = 2.08 + 1.32 = 3.40 \text{ lbs VOC/hr}$$

c. **Emission Limitations:**

VOC emissions shall not exceed 14.89 tons per year including adhesive materials.

**Applicable Compliance Method:**

The annual emission limitation was established by multiplying the hourly emission rate by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- d. Emission Limitations:  
VOC emissions from cleanup shall not exceed 1.32 tons per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated with total cleanup usage and worst case VOC content of the cleanup. The maximum annual emission rate was determined from the maximum cleanup usage rates as follows:

$$\begin{aligned} (\text{lbs cleanup/yr}) \times (\% \text{VOC by weight}) &= (16,644 \text{ lbs/yr}) \times (15.9 \text{ lbs VOC} / 100 \text{ lbs cleanup}) \\ / (2,000 \text{ lbs/ ton}) &= 1.32 \text{ tpy} \end{aligned}$$

**F. Miscellaneous Requirements**

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.