



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: 13-04329**

**Fac ID: 1318533475**

**DATE: 10/5/2004**

International Paper, Cleveland Container  
Tom Hardy  
6225 Camp Industrial Road  
Solon, OH 44139

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  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

CLAA



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**Permit To Install  
Terms and Conditions**

**Issue Date: 10/5/2004  
Effective Date: 10/5/2004**

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**FINAL PERMIT TO INSTALL 13-04329**

Application Number: 13-04329  
Facility ID: 1318533475  
Permit Fee: **\$500**  
Name of Facility: International Paper, Cleveland Container  
Person to Contact: Tom Hardy  
Address: 6225 Camp Industrial Road  
Solon, OH 44139

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

**6225 Camp Industrial Road  
Solon, Ohio**

Description of proposed emissions unit(s):

**&#65279;P008 - Ward Rotary Die Cutter 66 x 113 (3-color) for printing, cutting, and folding shipping containers.**

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 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

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

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

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

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**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	99.0 (total facility)
Individual HAPs	9.9 (total facility)
Combined HAPs	24.9 (total facility)

**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>	OAC rule 3745-35-07(B) Synthetic Minor to avoid Title V
P008 - Ward Rotary Die Cutter 66" x 113" (3-color) for printing, cutting, and folding shipping containers.	OAC rule 3745-31-05(A)(3)	

40 CFR 63 Subpart KK

OAC rule 3745-21-09(Y)(1)(A)

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**Emissions Unit ID: P008**

Applicable Emissions  
Limitations/Control Measures

Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 98.8 lbs/day from a combination of inks, coatings, adhesives, and clean-up materials.

Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 18.03 tpy, as a rolling 12-month summation, from a combination of inks, coatings, adhesives, and clean-up materials.

See A.2.c

The requirements of this rule include compliance with the requirements of OAC rule (s) 3745-21-09(Y)(1)(A); 3745-31-05(D); and 3745-35-07(B). The requirements of this rule also include compliance with the requirements of 40 CFR 63 Subpart KK.

See A.2.a

The VOC content of the coatings and inks employed shall not exceed forty per cent VOC by volume, excluding water and exempt solvents.

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

See A.2.b

**2. Additional Terms and Conditions**

- 2.a** In order to comply with the requirements of 40 CFR Part 63 Subpart KK, the permittee has chosen to commit to, and meet, the criteria outlined in 40 CFR 63.820(a)(2) for purposes of establishing the facility as an area source. To maintain status as an area source under this standard, the facility\* shall not exceed the following as a rolling, 12-month summation:
- i. Use less than 9.1 Mg (10 tons) per each rolling, 12-month period of each HAP at the facility, including materials used for source categories or purposes other than printing and publishing; and
  - ii. Use less than 22.7 Mg (25 tons) per each rolling, 12-month period of any combination of HAP at the facility, including materials used for source categories or purposes other than printing and publishing.
- 2.b** The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility\* shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.
- 2.c** The short term and annual VOC emission limitations are based on the emission units' potential to emit\*\*. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.
- \* The facility emission limits shall include emissions from the following units: K001, K002, P002, P004, P005, P006, P008.
- \*\* The potential to emit calculations are developed from the Printing Industry of Ohio's guidance document titled: "A Self Help Guide to Environmentally Sound Printing Operations".

## **B. Operational Restrictions**

1. The maximum annual volatile organic material usage for the facility (emissions units K001, K002, P002, P004, P005, P006, P008) shall not exceed 99.0 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

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

for the facility.

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

### **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the VOC content of each coating in percent VOC by volume, excluding water and exempt solvents, as applied [calculated in accordance with the equation specified in paragraph (B) of OAC rule 3745-21-10].
  2. The permittee shall collect and record the following information each month for all flexographic, packaging rotogravure, and publication rotogravure printing lines\*:
    - a. The name and identification number of each ink, additive, adhesive, and cleanup material employed;
    - b. The weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
    - c. The VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
    - d. The total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(2.b) x (2.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\*, in pounds per month;
    - e. The rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons; and
    - f. The actual operation hours for all printing presses combined, in hours per month.
- \* Flexographic, packaging rotogravure, and publication rotogravure printing lines for the facility shall include the following units: K001, K002, P004, P005, P008.
- \*\* If a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

3. The permittee shall collect and record the following information each month for the facility\*:
- a. The name and identification number of each ink, additive, adhesive, and cleanup material employed;
  - b. The weight, in pounds per month, of each ink, additive, adhesive, and cleanup material employed as applied;
  - c. The VOC content of each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - d. The total volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.c)] for each ink, additive, adhesive, and cleanup materials, and subtracting any recovered material\*\*, in pounds per month;
  - e. The rolling, 12-month summation of volatile organic material usage and VOC emissions from all ink, additive, adhesive, and cleanup materials employed, in tons;
  - f. The individual HAP and combined HAP content for each ink, additive, adhesive, and cleanup material employed, as applied, in percent by weight;
  - g. The total individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup materials employed calculated by summing the records of [(3.b) x (3.f)] for each ink, additive, adhesive, and cleanup material, in pounds per month; and
  - h. The rolling, 12-month summation of each individual HAP and combined HAP material usage and emissions from all ink, additive, adhesive, and cleanup materials employed, in tons.
- \* The facility emission limits shall include emissions from the following units: K001, K002, P002, P004, P005, P006, P008.
- \*\* If a credit for recovered cleanup/purge materials is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the cleanup/purge material collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section C.5.

4. The permittee shall collect and record the following information for this emission unit each month:
- a. The actual monthly press operation hours, in hours per month;
  - b. The number of days the press operated during the month;
  - c. The monthly VOC emissions from printing activities, calculated as [(2.d.) x (most recent product per press allocation factor\*)], in pounds per month; and
  - d. The average daily VOC emissions, calculated as [(4.c.) / (4.b.)].

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

K001 = 0.242966454	K002 = 0.128451311	P004 = 0.220592942
P005 = 0.220592942	P008 = 0.187396352	

5. If a credit for recovered materials is used to demonstrate facility\* compliance and/or used in calculations for emission reports, the permittee shall maintain the following records for the recovered cleanup/purge materials and the recovery drum, or tank, serving this emissions unit:
- a. The date the materials from the recovery drum or tank were shipped off site;
  - b. The amount of cleanup/purge material, in gallons or pounds, from the recovery drum or tank shipped off site;
  - c. The average density of the cleanup/purge material, in pounds per gallon, from the recovery drum or tank (if the amount is recorded in gallons);
  - d. The average VOC content for the recovered cleanup/purge material, in percent by weight; and
  - e. The average VOC emissions from the recovered cleanup/purge materials [(5.b.) x (5.d.)], in pounds. Note the average VOC emissions, in pounds, from the recovered cleanup/purge material is calculated as [(5.b.) x (5.c.) x (5.d.)] if the material amount is recorded in gallons.
- \* The facility emission limits shall include emissions from the following units: K001, K002, P002, P004, P005, P006, P008.

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

1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing the use of noncomplying coatings (40% VOC by Volume). The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified.
2. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any monthly record showing that the average daily emissions limitation for this emissions unit has been exceeded. The notification shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include the following:
  - a. A copy of any such record;
  - b. An identification of the probable cause for such deviation; and
  - c. Any corrective actions or preventative measures which have been, or will be taken, to correct the situation.
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility\* :
  - a. An identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. An identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 24.9 tons/yr based on a rolling, 12-month summation;
  - c. An identification of each month during which the rolling, 12-month volatile organic material usage and VOC emissions exceed 99.0 tons/yr based on a rolling, 12-month summation;

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

- \* The facility shall include emissions from the following units: K001, K002, P002, P004, P005, P006, P008.
4. As required by 40 CFR 63.830(b)(1), the permittee shall submit to the Cleveland DAQ an initial notification report\* no later than May 30, 1998, that contains the following information:
- a. The name, title and address of the owner or operator;
  - b. The address (i.e., physical location) of the affected source;
  - c. Identification of the applicable emission limitations and compliance date;
  - d. A statement of whether the affected emissions unit is located at a major source or at an area source; and
  - e. A brief description of each affected emissions unit, including the type of process operation performed.
- \* The permit application may be used in lieu of the initial notification [per 40 CFR §63.830(b)(1)(iii)].

#### **E. Testing Requirements**

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

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

  - b. Emission Limitation:  
18.03 tpy VOC

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

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

Emissions Unit ID: P008

99.0 tons VOC per rolling, 12-month period for this facility\*

Applicable Compliance Method:

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

d. Emission Limitation:

9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:

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

e. Emission Limitation:

24.9 tons combined HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:

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

f. Operational Limitation:

VOC content of all coatings shall not exceed 40 % VOC by volume, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the above limitation shall be based on the record keeping specified in section C.1. The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) and 24A (for flexographic and rotogravure printing inks) of 40 CFR, Part 60, Appendix A.

\* The facility emission (or usage) limits shall include emissions (or usage) from the following units: K001, K002, P002, P004, P005, P006, P008.

## F. Miscellaneous Requirements

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