



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

7/18/2014

THOMAS JESIONOWSKI
 PEXCO PACKAGING CORP
 795 BERDAN AVE
 TOLEDO, OH 43610

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0448011635
 Permit Number: P0116091
 Permit Type: Renewal
 County: Lucas

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
 Permit Review/Development Section
 Ohio EPA, DAPC
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

and Toledo Department of Environmental Services
 348 South Erie Street
 Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

Michael W. Ahern, Manager
 Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
 TDES; Michigan; Indiana; Canada

PUBLIC NOTICE

7/18/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

PEXCO PACKAGING CORP

795 BERDAN AVE,

Toledo, OH 43610

Lucas County

FACILITY DESC.: All Other Plastics Product Manufacturing

PERMIT #: P0116091

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO renewal permit for two flexographic printing presses and distiller.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Kurt Bezeau, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Pexco Packaging is located at 795 Berdan Ave in Toledo, OH and uses two flexographic printing presses (K001 and K003) to label plastic sheets off of a roll with their customer's logo before fusing the outsides to form a sealable bag. Both of these units' emissions are controlled by a catalytic incinerator. These presses were installed in 1990 & 1993 and this facility has applied for a renewal and Administrative modification of their existing FEPTIO. The facility also operates a waste ink and solvent distillation unit (P001).

This facility originally requested limits of 50,000 lbs for inks, 20,000 lbs for N. Propyl Alcohol (cleanup solvent), and 4,500 lbs for N. Propyl Acetate (cleanup solvent) per printing press in the permit renewal application. With these given annual usages, this facility would no longer be classified as a FEPTIO facility, but rather a non-Title V Facility since uncontrolled VOC emissions would be less than 100 tons per year.

With no changes made to the printing presses, TES had a meeting with the facility point of contact to verify that these given usages were accurate. Upon further investigation, this facility requested an annual usage increase to 100,000 lbs for inks, 82,000 lbs for N. Propyl Alcohol, and 43,000 lbs for N. Propyl Acetate for cleanup solvents per printing press. Although these usage rates are higher than initially requested in the renewal application, they are less than allowed in their current FEPTIO. At these usage rates, the potential to emit at this facility would be less than 100 tons per year VOC when taking into consideration the federally enforceable control requirement of OAC rule 3745-21-09(Y)(1)(b). However, the permittee has not indicated that these reported usage values are based on the maximum usage levels at the maximum operating rate for 8,760 hours per year, and the permittee has not requested removal of the synthetic minor status. To assure that this facility does not trigger Title V requirements based on unrestricted PTE, the permitting classification for this facility will remain as FEPTIO.

The permittee has requested to simplify the synthetic minor operational restrictions that are contained in their current FEPTIO to allow for operational flexibility. The synthetic minor restriction in this permit renewal will be based on a formula similar to that contained in permit number P0115316 from the Chrysler Group LLC – Wrangler Paint Facility. This formula allows the facility more flexibility in their process while still maintaining enforceability of their annual VOC emissions limitation.

3. Facility Emissions and Attainment Status:

The facility is currently classified as a synthetic minor source of VOC and HAP emissions and will be classified a synthetic minor source for VOC emissions only upon issuance of permit. Lucas County is designated attainment for all criteria pollutants.



4. Source Emissions:

K001 and K003 Flexographic Printing Lines

In the 2014 EAC form, the permittee reported maximum annual ink usage levels of 100,000 lbs/yr for K001 and K003 combined. On May 13, 2014, TES sent an email to Pexco Packaging asking for confirmation of the maximum unrestricted ink and solvent usage values when operating at maximum capacity 24 hours per day, 365 days per year. On May 14, 2014, Pexco Packaging replied and indicated that the ink and solvent usage values reported in the 2014 permit application are the maximum possible ink and solvent usage values. On June 4th, 2014, Pexco Packaging scheduled a meeting with TES to further discuss their proposed limits. After the meeting, it was determined that these limits needed to be verified. On June 11th, 2014, Pexco Packaging sent TES an email with a new annual ink usage limit of 100,000 lbs per printing press. On June 18th, Pexco Packaging sent TES an email with a new annual cleanup solvent usage limit of 82,000 lbs for N. Propyl Alcohol, and 43,000 lbs for N. Propyl Acetate.

	Material usage per line, pounds per year	VOC content % by weight
	2014 EAC (maximum)	
Inks	100,000	60
n-propyl alcohol	82,000	100
n-propyl acetate	43,000	100

Unrestricted, Uncontrolled Emissions (maximum emissions from K001, K003, and P001 combined)
 $[(2)(100,000 \text{ lbs/yr})(0.6 \text{ lb VOC/lb ink}) + (2)(82,000 + 43,000) \text{ lbs}](\text{ton}/2000\text{lbs}) = 185 \text{ tons/yr VOC}$

Since the above calculation of uncontrolled emissions assumes all VOC contained in ink and cleanup solvent is emitted at the printing lines (K001 and K003), and there is no VOC recovered from waste ink or spent cleanup solvent at the waste ink and solvent distiller (P001), emissions from P001 are not added to the above calculation of uncontrolled emissions, since if all VOC contained in ink and solvent is assumed emitted at the printing line, then including VOC emissions from P001 would result in double-counting of VOC emissions.

Based on the above calculation of uncontrolled potential to emit, the uncontrolled potential to emit for K001, K003, and P001 combined is greater than 100 tons per year. The permittee currently does not use HAP-containing inks or cleanup solvents at K001 or K003.

Controlled Emissions from K001 & K003 at SIP required control level - OAC rule 3745-21-09(Y)(1)b) requires 65% capture & 90% control of VOC

$[100,000 \text{ lbs ink}(0.6 \text{ lb VOC/lb ink}) + 125,000 \text{ lbs solvent}(1 \text{ lb VOC/lb solvent})][1 - (0.65)(0.90)](\text{ton}/2000\text{lbs}) = 38.4 \text{ tons/yr VOC}$, per line (76.8 tons/yr from K001, K003 and P001 combined) at the SIP required level of control. If the above-reported usage levels are the maximum usage rates at the maximum capacity of the printing presses for 8,760 hours per year of operation, then this would be the federally enforceable potential to emit at this emissions unit for purposes of determining Title V applicability. However, as stated above, the permittee has not indicated that these usage rates are the maximum usage rate at the maximum capacity of the printing presses for 8,760 hours per year of operation, and has not requested removal of synthetic minor requirements, so the permit renewal will remain a FEPTIO.



Controlled Emissions from K001 and K003 at BAT control level – 70% capture and 95% control of VOC

PTI 04-777 established the following BAT requirements for K001 and K003: 70% capture and 95% control of VOC emissions; 528 lbs/day and 79.1 tons/yr from K001-K003 combined; 4.0 lbs VOC/gal ink, and 7.3 lbs VOC/gal reducer/cleanup solvent.

This permit renewal contains an Administrative Modification to the BAT limit for VOC, and BAT will be expressed under the new BAT format (2/2014 Mike Hopkins BAT memo). The permittee requested to increase allowable VOC content as part of the permit renewal. This change is not considered a Chapter 31 Modification, because BAT would normally not have so many types of restrictions (capture & control efficiency, lb/hr& tons VOC/yr, and lbvoc/gal) as was contained in PTI 04-777. A lb VOC/gal limit would not be needed as part of BAT, if BAT already had a capture & control efficiency requirement along with lbs/hr& tons/yr VOC limits. Since the permittee has indicated that the maximum possible ink and solvent usage at 8760 hours/yr of operation is lower than that contained in the initial PTI determination, an increase in the ink VOC content is not increasing the allowable VOC emissions in lbs/day or tons/yr. A telephone call with Sudhir Singhal of Ohio EPA Central Office confirmed that BAT for Pexco Packaging may be revised to the new format in an Administrative Modification since the company's permit is not currently under appeal. Since this permit is an Administrative Modification, the Senate Bill 265 provisions do not apply.

BAT for K001 and K003 requires capture and control equipment designed to meet 70% capture and 95% control – the same capture and control efficiency level established in PTI 04-777.

$[100,000 \text{ lbs ink}(0.6 \text{ lb VOC/lb ink}) + 125,000 \text{ lbs solvent}(1 \text{ lb VOC/lb solvent})][1 - (0.70)(0.95)](\text{ton}/2000\text{lbs}) = 31.0 \text{ tons/yr VOC per printing line (62.0 tons/yr from K001, K003, and P001) at BAT level of control.}$

P001 Waste ink and solvent distiller manufactured by Giant Industries

Per the initial PTI writeup, this emissions unit is batch cycle waste ink and solvent distiller vented to the same catalytic incinerator serving K001 and K003. The capacity of the unit is 55 gallons and operates on a 14-hour cycle with 6 hours between cycles.

The following assumptions were used in setting allowable emissions in PTI 04-777 issued 7/14/1993.
Assume 100% solvent is added to unit with a density of 7 lbs/gal
Maximum batches/yr = 8760 hrs/yr (1 batch/14 hrs) = 626
100% capture and 95% control

The following information regarding the amount of solvent reclaimed, solvent emitted, and sludge remaining after distillation was obtained during a telephone conversation between TES and a Giant Industries technical representative on 3/19/1993.

90% by weight of solvent is reclaimed
1% by weight solvent evaporated to air
9% by weight remaining after evaporation is sludge

$626 \text{ batches/yr}(55 \text{ gal}/\text{batch})(7 \text{ lb VOC}/\text{gal})(0.01 \text{ lb vap}/\text{lb solvent})(1-0.95)(\text{ton}/2000 \text{ lb}) = 0.1 \text{ ton/yr VOC}$



Note that emissions from P001 are already included in the allowable emissions for K001 and K003, because the allowable emissions limitations for K001 and K003 were set based on the assumption that all VOC contained in the inks and solvents employed at K001 and K003 are emitted at K001 and K003.

P001 is not being modified.

Total Permit Allowable Emissions

K001	31.0 tons/yr VOC
K003	31.0 tons/yr VOC
<u>P001</u>	<u>0.1 ton/yr VOC</u>
Total	62.1 tons/yr VOC

5. Conclusion:

This renewal should be issued as a draft final action, since federally enforceable restrictions are needed to avoid Title V permitting requirements.

6. Please provide additional notes or comments as necessary:

BAT Discussion

As discussed above, BAT for K001 and K003 is being revised to be expressed as the format described in the 2/7/2014 BAT memo from Mike Hopkins. Per the 2/7/2014 memo, there are 3 steps used in determining the BAT limit: 1) Does a MACT/BACT/LAER limit apply? 2) does a RACT limit apply? 3) Case by Case BAT.

There are no MACT/BACT/LAER limits that apply to K001/K003. There are RACT Limits that apply to K001/K003 under OAC rule 3745-21-09(Y). Based on the permittee's requested VOC content for inks, the permittee would not be able to comply with OAC rule 3745-21-09(Y)(1)(a), but can comply with the control option under OAC rule 3745-21-09(Y)(1)(b) which requires a minimum capture efficiency of 60% and a minimum control efficiency of 90% (equates to 54% overall control). The most stringent RACT control requirement is specified in OAC rule 3745-21-09(Y)(4)(a)(i)(d) which specifies a minimum overall VOC control efficiency of 80% when both the emissions unit and control device are installed after 4/2/2009 for the counties listed in OAC rule 3745-21-09(Y)(4). The RACT limits of OAC rule 3745-21-09(Y)(4) did not exist in 1993 when PTI 04-777 was issued, so, the most stringent RACT limit in effect at the time of the initial PTI was the limit under OAC rule 3745-21-09(Y)(1)(b).

Per OAC rule 3745-21-09(Y)(3), the exemption from OAC rule 3745-21-09(Y)(2)(b) and (d) do not apply to this facility.

Also per Section 4.d. of the 2/7/2014 memo, the BAT limit will need to be changed to express that the limit is to be based on a source design efficiency. Since the permittee has previously conducted capture and control efficiency stack testing at this emissions unit documenting that the actual capture/control efficiency limitation can be met, TES is not requiring the permittee to submit the 1990s design efficiency information. Actual capture efficiency was determined 8/11/1995 to be 90% for K001 and 91% for K003. Actual destruction efficiency was determined 12/20/2011 to be 95%. Per the guidance contained in Section 4.d of the 2/7/2014, memo, testing after an initial stack test is not required for purposes of BAT. However, since the emissions unit is required to comply with the capture and control efficiency requirements of OAC rule 3745-21-09(Y)(1)(b), TES is recommending that destruction efficiency testing be conducted 6 months prior to each permit renewal to confirm that the



destruction efficiency needed to comply with OAC rule 3745-21-09(Y)(1)(b) is still being met.

Federally Enforceable Discussion:

A federally enforceable restriction was added to the permit because the unrestricted PTE for Pexco Packaging is 185 tons per year and a federally enforceable restriction is needed to reduce their rolling 12-month emissions to 62.0 tons per year from K001 and K003 in order to avoid Title V requirements. The calculation below was provided to allow for operational flexibility.

$$62.0 \text{ tons VOC} \geq (1 - \mu) * [\sum_{i=1}^n (Q_i)(VOC_i) + \sum_{c=1}^n (Q_c)(VOC_c)] / (2000 \text{ pounds/ton})$$

Where:

Q_i = usage of ink "i" in pounds.

VOC_i = the mass of VOC emitted per volume of ink "i" in percent by weight.

Q_c = usage of cleanup solvents "c" in pounds.

VOC_c = the mass of VOC emitted per volume of cleanup solvents "c" in percent by weight.

μ = the overall capture and control efficiency for the control equipment stated as a decimal fraction where $\mu = (\text{capture efficiency \%}) * (\text{control efficiency \%})$

Applicable Rules/Regulations

OAC rule 3745-31-05(A)(3)	70% capture and 95% control for K001 & K003; 100% capture & 95% control, 0.5 lb/day and 0.1 ton/yr VOC for P001. The BAT limit for P001 originated in PTI 04-777 issued 7/14/1993.
OAC rule 345-21-09(Y)(1)(b)	Requires 60% capture & 90% control of VOC for K001 & K003, which is less stringent than OAC rule 3745-31-05(A)(3) Per OAC rule 3745-21-09(Y)(3), the exemptions contained in OAC rule 3745-21-09(Y)(2)(b) and (d) do not apply to this facility.
Senate Bill 265	The requirements of Senate Bill 265 do not apply to this permit, since there has not been a Chapter 31 modification on or after 8/3/2009.
OAC rule 3745-31-05(D)	Emissions rate shall not exceed 62.0 tons volatile organic compounds (VOC) emissions per rolling, 12-month period from K001 and K003 combined.
40 CFR Part 63, Subpart KK	The permittee submitted an initial notification dated 6/4/1999 to U.S. EPA Region 5 indicating that Pexco Packaging is an area source of HAP, and thus is not subject to the requirements of 40 CFR Part 63, Subpart KK, since this standard only applies to major sources of HAP.



7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	62.1 (17.1 decrease)



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
PEXCO PACKAGING CORP**

Facility ID:	0448011635
Permit Number:	P0116091
Permit Type:	Renewal
Issued:	7/18/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



**Division of Air Pollution Control
Permit-to-Install and Operate
for
PEXCO PACKAGING CORP**

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Draft Permit-to-Install and Operate

PEXCO PACKAGING CORP

Permit Number: P0116091

Facility ID: 0448011635

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448011635
Application Number(s): A0049772, A0050743, A0051181
Permit Number: P0116091
Permit Description: FEPTIO renewal permit for two flexographic printing presses and distiller.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/18/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

PEXCO PACKAGING CORP
795 BERDAN AVE
Toledo, OH 43610

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0116091

Permit Description: FEPTIO renewal permit for two flexographic printing presses and distiller.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P001
Company Equipment ID:	Giant Distiller S-60 SER #112
Superseded Permit Number:	P0104056
General Permit Category and Type:	Not Applicable

Group Name: X001

Emissions Unit ID:	K001
Company Equipment ID:	586 FMC Press #3646
Superseded Permit Number:	P0104056
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	586 FMC Press #3515
Superseded Permit Number:	P0104056
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
PEXCO PACKAGING CORP
Permit Number: P0116091
Facility ID: 0448011635
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the “Authorization” page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



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B. Facility-Wide Terms and Conditions



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1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



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C. Emissions Unit Terms and Conditions



1. P001, Giant Distiller S-60 SER #112

Operations, Property and/or Equipment Description:

Waste ink and solvent distillation unit vented to catalytic incinerator

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 04-777 issued 7/14/1993)	<p>Volatile organic compound (VOC) emissions shall not exceed 0.5 lb per day and 0.1 ton per year.</p> <p>The minimum VOC emissions capture efficiency for this emissions unit shall be 100 percent.</p> <p>The minimum VOC destruction efficiency for this emissions unit shall be 95 percent.</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.



d) **Monitoring and/or Recordkeeping Requirements**

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time the emissions unit(s) controlled by the catalytic incinerator is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance. The acceptable average temperature difference across the catalyst bed, for any 3-hour block of time (when the emissions unit(s) is/are in operation), shall not be less than 80 percent of the average temperature difference measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance.
- (2) The permittee shall operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;
 - b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and
 - c. a log or record of the operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit(s).

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed.

e) **Reporting Requirements**

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.



- (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the temperature monitoring requirements in term number d)(1) and d)(2) above:
 - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emissions test that demonstrated the emissions unit was in compliance; and
 - b. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference established during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance.
 - c. the probable cause of each deviation (excursion);
 - d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - e. the magnitude and duration of each deviation (excursion).
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

VOC emissions shall not exceed 0.5 pound per day.



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the daily emission limitation by determining the hourly emissions in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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. Multiply the hourly emissions by the hours of operation of the emissions unit as recorded in d)(2)c. to obtain the daily emissions

b. Emission Limitation:

VOC emissions shall not exceed 0.1 ton per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the daily emission limitation by determining the hourly emissions (pounds per hour) in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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. Multiply the hourly emissions (pounds per hour) by the annual hours of operation and divide by 2,000 pounds per ton to determine the annual emissions (tons per year).

c. Emission Limitation:

Minimum VOC capture efficiency of 100% by weight

Applicable Compliance Method:

If required, the 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.)

d. Emission Limitation:

Minimum VOC destruction efficiency of 95% by weight

Applicable Compliance Method:

If required, the 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 3745-21-10 or



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an alternative test protocol approved by the Ohio EPA. 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.

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group -X001: K001,K003,

EU ID	Operations, Property and/or Equipment Description
K001	Flexographic Printing Press with catalytic incinerator
K003	Flexographic Printing Press 3 with catalytic incinerator

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)c., d)(1) through d)(3), e)(1), e)(5), f)(1)a. through f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Administrative Modification)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	62.0 tons volatile organic compound (VOC) emissions per rolling, 12-month period. See b)(2)b. and b)(2)c.
c.	OAC rule 3745-21-09(Y)(1)(b)	See b)(2)d.

(2) Additional Terms and Conditions

a. Best available technology (BAT) includes compliance with the VOC capture and destruction efficiency requirement established under OAC rule 3745-31-05(D).



- b. The permittee shall operate and maintain a capture (collection) and catalytic incineration system with a minimum VOC capture efficiency of 70% and a minimum VOC destruction efficiency of 95%.
- c. The combined emissions from K001 and K003 shall not exceed 62.0 tons of VOC per rolling 12-month period. The maximum ink and cleanup solvent usage in this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month summation:

$$62.0 \text{ tons VOC} \geq (1 - \mu) * [\sum_{i=1}^n (Q_i)(VOC_i) + \sum_{c=1}^n (Q_c)(VOC_c)] / (2000 \text{ pounds/ton})$$

Where:

Q_i = usage of ink "i" in pounds.

VOC_i = VOC content of ink "i" in percent by weight.

Q_c = usage of cleanup solvent "c" in pounds.

VOC_c = VOC content of cleanup solvent "c" in percent by weight.

μ = the overall capture and control efficiency for the control equipment stated as a decimal fraction where $\mu = (\text{capture efficiency \%}) * (\text{control efficiency \%})$

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months of operation after issuance of this permit.

- d. The capture and control efficiency requirement specified in this rule is less stringent than that established under OAC rule 3745-31-05(D).
- c) Operational Restrictions
 - (1) None.
 - d) Monitoring and/or Recordkeeping Requirements
 - (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time the emissions unit(s) controlled by the catalytic incinerator is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance. The acceptable average temperature difference across the catalyst bed, for any 3-hour block of time (when the emissions unit(s) is/are in operation), shall not be less than 80 percent of the average temperature difference measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance.
 - (2) The permittee shall operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater.



The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;
- b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and
- c. a log or record of the operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit(s).

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed.

(3) For purposes of compliance with the rolling 12-month maximum ink and cleanup solvent utilization in this emissions unit the permittee shall collect and record on a monthly basis the following information:

- a. the company identification for each ink and cleanup solvent utilized;
- b. the weight of each ink and cleanup solvent applied during the month, Q_i and Q_c , in pounds;
- c. the VOC content of each ink and cleanup solvent applied during the month, VOC_i and VOC_c , in percent by weight;
- d. the total VOC emissions from all inks and cleanup solvents utilized, in tons $(1 - \mu) * [\sum_{i=1}^n (Q_i)(VOC_i) + \sum_{c=1}^n (Q_c)(VOC_c)] / (2000 \text{ pounds/ton})$, in tons per month; and
- e. the rolling 12-month summation of VOC emissions in tons.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent emissions test that demonstrated the emissions unit was in compliance; and



- b. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference established during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance.
- c. the probable cause of each deviation (excursion);
- d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- e. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the temperature monitoring requirements in term number d)(1) and d)(2) above:
 - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average



temperature established during the most recent emissions test that demonstrated the emissions unit was in compliance; and

- b. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference established during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance.
- c. the probable cause of each deviation (excursion);
- d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- e. the magnitude and duration of each deviation (excursion).

(5) The permittee shall submit quarterly deviation (excursion) reports that include any monthly record showing that the annual maximum ink or cleanup solvent utilization exceeds the applicable limitation, i.e., $62.0 \text{ tons VOC} \leq (1 - \mu) * [\sum_{i=1}^n (Q_i)(VOC_i) + c = 1nQ_cVOC_c] / (2000 \text{ pounds/ton})$ in any rolling 12-month period.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Minimum VOC capture efficiency of 70% by weight

Applicable Compliance Method:

If required, the 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.)

Capture efficiency testing conducted on August 11, 1995 by material balance along with VOC testing using the Byron Modification to Method 25 (testing protocol approved by U.S. EPA Region 5 on 8/11/1994) determined an actual VOC capture efficiency of 90% for K001 and 91.9% K003.



b. Emission Limitation:

Minimum VOC destruction efficiency of 95% by weight

Applicable Compliance Method:

If required, the 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.

Method 25A destruction efficiency testing conducted December 20, 2011 determined an actual VOC destruction efficiency of 95%.

c. Emission Limitation:

The combined emissions from K001 and K003 shall not exceed 62.0 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3).

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

- (3) 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 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the minimum VOC destruction efficiency requirement for K001 and K003.
 - c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for Emissions Units K001 and K003:



The 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 3745-21-10(C) or an alternative test protocol approved by the Ohio EPA. 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.

The test report required by f)(3)g. shall also include the following information based on the temperature readings required to be recorded under d)(2):

- i. 3-hour average temperature of the exhaust gases immediately before the catalyst bed during the emission test;
 - ii. 3-hour average temperature difference across the catalyst bed during testing; and
 - iii. A copy of the temperature monitoring data required to be recorded under d)(2) shall also be included with the test report for the day that the emissions test was conducted.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.



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g) Miscellaneous Requirements

(1) None.