



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
BUTLER 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: 14-05598**

**Fac ID: 1409000969**

**DATE: 8/31/2004**

Sonoco Products Company  
Loran Laster  
4633 Dues Drive  
Cincinnati, OH 45246

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

HCDES



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**Permit To Install  
Terms and Conditions**

**Issue Date: 8/31/2004  
Effective Date: 8/31/2004**

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**FINAL PERMIT TO INSTALL 14-05598**

Application Number: 14-05598  
Facility ID: 1409000969  
Permit Fee: **\$2400**  
Name of Facility: Sonoco Products Company  
Person to Contact: Loran Laster  
Address: 4633 Dues Drive  
Cincinnati, OH 45246

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4633 Dues Drive  
Cincinnati, Ohio**

Description of proposed emissions unit(s):  
**Four production lines for manufacturing paperboard 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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**PTI Application: 14-05598**  
**Issued: 8/31/2004**

**Facility ID: 1409000969**

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	74.19
PM/PM10	0.225

**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.

Operations, Property,  
and/or Equipment

Applicable Rules/Requirements

OAC rule 3745-21-09(F)

P001 - Composite Container Line 1 OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-11(B)(1)

OAC rule 3745-17-07(A)(1)

Applicable Emissions  
Limitations/Control Measures

5.48 lbs VOC/hr\*  
24.1 TPY VOC\*

0.017 lbs PM-PM10/hr\*  
0.073 TPY PM-PM10\*

\* The hourly and annual VOC and PM-PM10 emissions limitations are based on the emissions unit's Potential To Emit (PTE) so no hourly or annual records are required to demonstrate compliance with these limits.

See terms and conditions A.2.a - A.2.e and B.1.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

## **2. Additional Terms and Conditions**

- 2.a** The volatile organic compound (VOC) content of the mandrill lubricants used in this emissions unit shall not exceed 6.32 pounds per gallon, as applied.
- 2.b** The volatile organic compound (VOC) content of the body board adhesives used in this emissions unit shall not exceed 0.02 pounds per gallon, as applied.
- 2.c** The volatile organic compound (VOC) content of the label adhesives used in this emissions unit shall not exceed 0.0036 pounds per gallon, as applied.
- 2.d** Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average.
- 2.e** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitations, the mass emissions limitations, the visible emissions limitations and the use of PM control equipment with an overall control efficiency of 99.9%.

**B. Operational Restrictions**

- 1. This emissions unit shall be operated with a dust collection and control device with a 99.9% overall control efficiency.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification of each coating (adhesive and lubricant) employed.
  - b. The volatile organic compound (VOC) content of each coating, as applied, in pounds per gallon.
  - c. The number of gallons of each coating employed.
  - d. The total VOC emissions from all coatings employed in pounds or tons (b x c).

**D. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record which shows the use of noncomplying coatings (i.e., coatings exceeding the allowable VOC content limits). The notification shall include a copy of such record and shall be

sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which noncomplying coatings were first employed.

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

1. Compliance with the emission limitations in Sections A.1 and A.2. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

5.48 lbs VOC/hr\*  
24.1 TPY VOC\*

0.017 lbs PM-PM10/hr\*  
0.073 TPY PM-PM10\*

\* The hourly and annual VOC and PM-PM10 emissions limitations are based on the emissions unit's Potential To Emit (PTE) so no hourly or annual records are required to demonstrate compliance with these limits.

#### Applicable Compliance Method:

The VOC emissions rate was based on the total combined emissions from the mandrill lubricant, body board adhesive and label adhesive. The VOC emissions are calculated by multiplying the amount of coating used by the maximum VOC content as identified in term A.2.a. - A.2.c. The annual limit is determined by multiplying the maximum usage rate by maximum VOC content, as identified in terms A.2.a. - A.2.c., and dividing by 2000 lb/ton.

The PM-PM10 emissions rate was based on the emission factor data contained in the PTI application 14-05598, as submitted on July 22, 2004 and a PM-PM10 emission control efficiency of 99.9 percent. The annual limit is determined by multiplying the maximum controlled emission rate by 8760 hours per year, and dividing by 2000 lb/ton.

- b. Emissions limitation:

The volatile organic compound (VOC) content of the mandrill lubricants used in this

Emissions Unit ID: **P001**

emissions unit shall not exceed 6.32 pounds per gallon, as applied.

The volatile organic compound (VOC) content of the body board adhesives used in this emissions unit shall not exceed 0.02 pounds per gallon, as applied.

The volatile organic compound (VOC) content of the label adhesives used in this emissions unit shall not exceed 0.0036 pounds per gallon, as applied.

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the VOC content limitations will be determined by the record keeping requirements specified in Section C.1.

c. Emissions Limitation:

Visible particulate emissions from any stack associated with emissions unit P001 shall not exceed ten percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources.")

## **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year 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>	
P002 - Composite Container Line 2	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(F)
	OAC rule 3745-17-11(B)(1)	
	OAC rule 3745-17-07(A)(1)	

Applicable Emissions  
Limitations/Control Measures

4.06 lbs VOC/hr\*  
17.79 TPY VOC\*

0.012 lbs PM-PM10/hr\*  
0.054 TPY PM-PM10\*

\* The hourly and annual VOC and PM-PM10 emissions limitations are based on the emissions unit's Potential To Emit (PTE) so no hourly or annual records are required to demonstrate compliance with these limits.

See terms and conditions A.2.a - A.2.e and B.1.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

**2.a** The volatile organic compound (VOC) content of the mandrill lubricants used in this

emissions unit shall not exceed 6.32 pounds per gallon, as applied.

- 2.b** The volatile organic compound (VOC) content of the body board adhesives used in this emissions unit shall not exceed 0.02 pounds per gallon, as applied.
- 2.c** The volatile organic compound (VOC) content of the label adhesives used in this emissions unit shall not exceed 0.0036 pounds per gallon, as applied.
- 2.d** Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average.
- 2.e** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitations, the mass emissions limitations, the visible emissions limitations and the use of PM control equipment with an overall control efficiency of 99.9%.

## **B. Operational Restrictions**

- 1. This emissions unit shall be operated with a dust collection and control device with a 99.9% overall control efficiency.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification of each coating (adhesive and lubricant) employed.
  - b. The volatile organic compound (VOC) content of each coating, as applied, in pounds per gallon.
  - c. The number of gallons of each coating employed.
  - d. The total VOC emissions from all coatings employed in pounds or tons (b x c).

## **D. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record which shows the use of noncomplying coatings (i.e., coatings exceeding the allowable VOC content limits). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which noncomplying coatings were first employed.

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

1. Compliance with the emission limitations in Sections A.1 and A.2. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

4.06 lbs VOC/hr\*

17.79 TPY VOC\*

0.012 lbs PM-PM10/hr\*

0.054 TPY PM-PM10\*

\* The hourly and annual VOC and PM-PM10 emissions limitations are based on the emissions unit's Potential To Emit (PTE) so no hourly or annual records are required to demonstrate compliance with these limits.

Applicable Compliance Method:

The VOC emissions rate was based on the total combined emissions from the mandrill lubricant, body board adhesive and label adhesive. The VOC emissions are calculated by multiplying the amount of coating used by the maximum VOC content as identified in term A.2.a. - A.2.c. The annual limit is determined by multiplying the maximum usage rate by maximum VOC content, as identified in term A.2.a. - A.2.c., and dividing by 2000 lb/ton.

The PM-PM10 emissions rate was based on the emission factor data contained in the PTI application 14-05598, as submitted on July 22, 2004 and a PM-PM10 emission control efficiency of 99.9 percent. The annual limit is determined by multiplying the maximum controlled emission rate by 8760 hours per year, and dividing by 2000 lb/ton.

- b. Emissions limitation:

The volatile organic compound (VOC) content of the mandrill lubricants used in this emissions unit shall not exceed 6.32 pounds per gallon as applied.

The volatile organic compound (VOC) content of the body board adhesives used in this

Emissions Unit ID: **P002**

emissions unit shall not exceed 0.02 pounds per gallon as applied.

The volatile organic compound (VOC) content of the label adhesives used in this emissions unit shall not exceed 0.0036 pounds per gallon as applied.

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the VOC content limitations will be determined by the record keeping requirements specified in Section C.1.

c. Emissions Limitation:

Visible particulate emissions from any stack associated with emissions unit P002 shall not exceed ten percent opacity as a six-minute average.

Applicable Compliance Method:

If required compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources.")

## **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year 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>	
P003 - Composite Container Line 3	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(F)
	OAC rule 3745-17-11(B)(1)	
	OAC rule 3745-17-07(A)(1)	

**Sonoco**  
**PTI A**  
**Issued: 8/31/2004**

Emissions Unit ID: **P003**

Applicable Emissions  
Limitations/Control Measures

4.74 lbs VOC/hr\*  
20.75 TPY VOC\*

0.014 lbs PM-PM10/hr\*  
0.063 TPY PM-PM10\*

\* The hourly and annual VOC and PM-PM10 emissions limitations are based on the emissions unit's Potential To Emit (PTE) so no hourly or annual records are required to demonstrate compliance with these limits.

See terms and conditions A.2.a - A.2.e and B.1.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a** The volatile organic compound (VOC) content of the mandrill lubricants used in this emissions unit shall not exceed 6.32 pounds per gallon, as applied.
- 2.b** The volatile organic compound (VOC) content of the body board adhesives used in this emissions unit shall not exceed 0.02 pounds per gallon, as applied.
- 2.c** The volatile organic compound (VOC) content of the label adhesives used in this emissions unit shall not exceed 0.0036 pounds per gallon, as applied.
- 2.d** Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average.
- 2.e** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitations, the mass emissions limitations, the visible emissions limitations and the use of PM control equipment with an overall control efficiency of 99.9%.

**B. Operational Restrictions**

- 1. This emissions unit shall be operated with a dust collection and control device with a 99.9% overall control efficiency.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification of each coating (adhesive and lubricant) employed.
  - b. The volatile organic compound (VOC) content of each coating, as applied, in pounds per gallon.
  - c. The number of gallons of each coating employed.
  - d. The total VOC emissions from all coatings employed in pounds or tons (b x c).

**D. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record which shows the use of noncomplying coatings (i.e., coatings exceeding the allowable VOC content limits). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the

end of the calendar month in which noncomplying coatings were first employed.

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

1. Compliance with the emission limitations in Sections A.1 and A.2. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

4.74 lbs VOC/hr\*  
20.75 TPY VOC\*

0.014 lbs PM-PM10/hr\*  
0.063 TPY PM-PM10\*

\* The hourly and annual VOC and PM-PM10 emissions limitations are based on the emissions unit's Potential To Emit (PTE) so no hourly or annual records are required to demonstrate compliance with these limits.

##### Applicable Compliance Method:

The VOC emissions rate was based on the total combined emissions from the mandrill lubricant, body board adhesive and label adhesive. The VOC emissions are calculated by multiplying the amount of coating used by the maximum VOC content as identified in term A.2.a. - A.2.c. The annual limit is determined by multiplying the maximum usage rate by maximum VOC content, as identified in term A.2.a. - A.2.c., and dividing by 2000 lb/ton.

The PM-PM10 emissions rate was based on the emission factor data contained in the PTI application 14-05598, as submitted on July 22, 2004 and a PM-PM10 emission control efficiency of 99.9 percent. The annual limit is determined by multiplying the maximum controlled emission rate by 8760 hours per year, and dividing by 2000 lb/ton.

- b. Emissions limitation:

The volatile organic compound (VOC) content of the mandrill lubricants used in this emissions unit shall not exceed 6.32 pounds per gallon as applied.

The volatile organic compound (VOC) content of the body board adhesives used in this emissions unit shall not exceed 0.02 pounds per gallon as applied.

The volatile organic compound (VOC) content of the label adhesives used in this emissions unit shall not exceed 0.0036 pounds per gallon as applied.

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the VOC content limitations will be determined by the record keeping requirements specified in Section C.1.

c. Emissions Limitation:

Visible particulate emissions from any stack associated with emissions unit P003 shall not exceed ten percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources.")

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year 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>	OAC rule 3745-21-09(F)
P004 - Composite Container Line 4	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-11(B)(1)	
	OAC rule 3745-17-07(A)(1)	

Applicable Emissions  
Limitations/Control Measures

2.64 lbs VOC/hr\*  
11.55 TPY VOC\*

0.008 lbs PM-PM10/hr\*  
0.035 TPY PM-PM10\*

\* The hourly and annual VOC and PM-PM10 emissions limitations are based on the emissions unit's Potential To Emit (PTE) so no hourly or annual records are required to demonstrate compliance with these limits.

See terms and conditions A.2.a - A.2.e and B.1.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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**2. Additional Terms and Conditions**

- 2.a** The volatile organic compound (VOC) content of the mandrill lubricants used in this emissions unit shall not exceed 6.32 pounds per gallon, as applied.
- 2.b** The volatile organic compound (VOC) content of the body board adhesives used in this emissions unit shall not exceed 0.02 pounds per gallon, as applied.
- 2.c** The volatile organic compound (VOC) content of the label adhesives used in this emissions unit shall not exceed 0.0036 pounds per gallon, as applied.
- 2.d** Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average.
- 2.e** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitations, the mass emissions limitations, the visible emissions limitations and the use of PM control equipment with an overall control efficiency of 99.9%.

**B. Operational Restrictions**

- 1. This emissions unit shall be operated with a dust collection and control device with a 99.9% overall control efficiency.

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification of each coating (adhesive and lubricant) employed.
  - b. The volatile organic compound (VOC) content of each coating, as applied, in pounds per gallon.
  - c. The number of gallons of each coating employed.
  - d. The total VOC emissions from all coatings employed in pounds or tons (b x c).

**D. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record which shows the use of noncomplying coatings (i.e., coatings exceeding the allowable VOC content limits). The notification shall include a copy of such record and shall be

Emissions Unit ID: **P004**

sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month in which noncomplying coatings were first employed.

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

1. Compliance with the emission limitations in Sections A.1 and A.2. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

2.64 lbs VOC/hr\*  
11.55 TPY VOC\*

0.008 lbs PM-PM10/hr\*  
0.035 TPY PM-PM10\*

\* The hourly and annual VOC and PM-PM10 emissions limitations are based on the emissions unit's Potential To Emit (PTE) so no hourly or annual records are required to demonstrate compliance with these limits.

##### Applicable Compliance Method:

The VOC emissions rate was based on the total combined emissions from the mandrill lubricant, body board adhesive and label adhesive. The VOC emissions are calculated by multiplying the amount of coating used by the maximum VOC content as identified in term A.2.a. - A.2.c. The annual limit is determined by multiplying the maximum usage rate by maximum VOC content, as identified in term A.2.a. - A.2.c., and dividing by 2000 lb/ton.

The PM-PM10 emissions rate was based on the emission factor data contained in the PTI application 14-05598, as submitted on July 22, 2004 and a PM-PM10 emission control efficiency of 99.9 percent. The annual limit is determined by multiplying the maximum controlled emission rate by 8760 hours per year, and dividing by 2000 lb/ton.

- b. Emissions limitation:

The volatile organic compound (VOC) content of the mandrill lubricants used in this emissions unit shall not exceed 6.32 pounds per gallon as applied.

The volatile organic compound (VOC) content of the body board adhesives used in this emissions unit shall not exceed 0.02 pounds per gallon as applied.

The volatile organic compound (VOC) content of the label adhesives used in this emissions unit shall not exceed 0.0036 pounds per gallon as applied.

Applicable Compliance Method:

USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the VOC content limitations will be determined by the record keeping requirements specified in Section C.1.

c. Emissions Limitation:

Visible particulate emissions from any stack associated with emissions unit P004 shall not exceed ten percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources.")

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.