State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
CLERMONT COUNTY
Application No: 14-04806

DATE: March 29, 2000

Georgia-Pacific Corporation
Patrick W Davis
220 West North Bend Road
Cincinnati, OH 45216

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, buy it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
HCDES

FINAL PERMIT TO INSTALL 14-04806

Application Number:	14-04806
APS Premise Number:	1413020453
Permit Fee:	**$1800**
Name of Facility:	Georgia-Pacific Corporation
Person to Contact:	Patrick W Davis
Address:	220 West North Bend Road Cincinnati, OH 45216

Location of proposed air contaminant source(s) [emissions unit(s)]:
Front Wheel Drive near Curliss
Batavia, **Ohio**

Description of proposed emissions unit(s):
5-FLEXOGRAPHIC PRINTING PRESSES, AND PNEUMATIC PAPER SCRAP COLLECTION SYSTEM.

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 Related to Monitoring and Recordkeeping 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 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	59.07
PM	13.65
PM_{10}	6.83
Ammonia	4.93

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	Applicable Emissions Limitations/Control Measures
Flexographic Printing Press (Staley Die Cutter) with Tanabe Folder Gluer	OAC rule 3745-31-05(A)(3)	4.39 lbs/hr VOC, including cleanup. 10.30 TPY VOC 0.36 lb/hr and 0.72 TPY ammonia
	OAC rule 3745-31-05(D)	10.30 TPY VOC, including cleanup, based upon a rolling, 12-month summation See Section A.2.2.c., A.2.2.d., A.2.2.e. and B.1.
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.b.
	OAC rule 3745-15-07	See Part I, Term A.7.

2. Additional Terms and Conditions

2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

2.b The VOC content of each coating and adhesive employed in this emissions unit shall not exceed the following limitations:

i. Forty (40%) percent VOC by volume of the coating and ink, excluding water and

exempt solvents; or

ii. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

2.c The VOC content of the coatings employed in this emissions unit shall not exceed 8.3% by weight VOC, as applied.

2.d The VOC content of the adhesives employed in this emissions unit shall not exceed 3.6% by weight VOC, as applied.

2.e The VOC content of the cleanup material employed in this emissions unit shall not exceed 30% by weight VOC.

2.f Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, and usage limitations.

B. Operational Restrictions

1. The maximum annual usage rates for emissions unit K001 shall not exceed 168,000 pounds of coatings, 160,000 pounds of adhesives, and 3,000 pounds of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

Months(s)	Maximum Allowable Cumulative Coating Usage In Pounds	Maximum Allowable Cumulative Adhesive Usage In Pounds	Maximum Allowable Cumulative Cleanup Usage In Pounds
1	14,000	13,333	250
1-2	28,000	26,666	500
1-3	42,000	39,999	750
1-4	56,000	53,332	1,000
1-5	70,000	66,665	1,250
1-6	84,000	79,998	1,500
1-7	98,000	93,331	1,750

1-8	112,000	106,664	2,000
1-9	126,000	119,997	2,250
1-10	140,000	133,330	2,500
1-11	154,000	146,663	2,750
1-12	168,000	160,000	3,000

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K001:

   a. The company identification for each coating, adhesive and cleanup material employed;

   b. The VOC content of each coating, adhesive and cleanup material in % by weight VOC, as applied;

   c. The ammonia content of each coating, adhesive and cleanup material in percent by weight, as applied;

   d. The percent VOC by volume of each coating and adhesive (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating and adhesive;

   e. The number of pounds of each coating, adhesive and cleanup material employed;

   f. The updated rolling, 12-month summation of usage rates for the coatings, adhesives, and cleanup materials employed in pounds. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;

   g. The total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];

   h. The updated rolling, 12-month summation for the total combined VOC emissions from all

coatings, adhesives and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;

i. The total combined ammonia emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, adhesives and cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly reports which specify the rolling, 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings, adhesives and cleanup materials used in emission unit K001 for each month. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitations:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

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

b. Emission Limitation:
VOC content of 8.3% by weight for coatings employed;
VOC content of 3.6% by weight for adhesives employed; and
VOC content of 30% by weight for cleanup materials employed.

Applicable Compliance Method:
USEPA Method 24A shall be used to determine the VOC contents of the coatings, adhesives, and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating, 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 alternate analytical procedures or alternative precision statements for Method 24A.

c. Emission Limitation:
4.39 lbs/hr VOC, including cleanup

Applicable Compliance Method:
Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (43.2 lbs/hr, 18.3 lbs/hr, and 0.5 lb/hr respectively) by their maximum allowable VOC contents and adding the results.

d. Emission Limitation:
10.30 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

e. Usage Limitations:

Less than 168,000 pounds coatings per year;
Less than 160,000 pounds adhesives per year; and
Less than 3,000 pounds cleanup materials per year.

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

f. Emission Limitation:
0.36 lb/hr ammonia

Applicable Compliance Method:
Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (43.2 lbs/hr, 18.3 lbs/hr, and 0.5 lb/hr respectively) by their maximum ammonia content (in percent by weight) and adding the results.

g. Emission Limitation:
0.72 TPY ammonia

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ammonia
TLV (ug/m3): 17,410
Maximum Hourly Emission Rate (lbs/hr): 2.77
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 215.1
MAGLC (ug/m3): 415

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 the OAC rule 3745-31-01. The permittee is

hereby advised that the following changes to the process may be determined to be a "modification":

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.a., A.2.2.b., A.2.2.c., A.2.2.d., A.2.2.e., A.2.2.f., B.1., C.1., D.1., D.2., and E.1.

Georgia-Pacific Corporation Facility ID: **1413020453**

PTI Application: **14-04806**

Date: Marc

Emissions Unit ID: **K001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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	Applicable Emissions Limitations/Control Measures
Flexographic printing press with glue station (Martin "Mini" Flexographic)	OAC rule 3745-31-05(A)(3)	4.88 lbs/hr VOC, including cleanup. 11.49 TPY VOC 0.44 lb/hr and 0.99 TPY ammonia
	OAC rule 3745-31-05(D)	11.49 TPY VOC, including cleanup, based upon a rolling, 12-month summation See Section A.2.2.c, A.2.2.d, A.2.2.e and B.1.
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.b.
	OAC rule 3745-15-07	See Part I, Term A.7.

2. Additional Terms and Conditions

2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

2.b The VOC content of each coating and adhesive employed in this emissions unit shall not

exceed the following limitations:

i. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or

ii. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

2.c The VOC content of the coatings employed in this emissions unit shall not exceed 8.3% by weight VOC, as applied.

2.d The VOC content of the adhesives employed in this emissions unit shall not exceed 3.6% by weight VOC, as applied.

2.e The VOC content of the cleanup material employed in this emissions unit shall not exceed 30% by weight VOC.

2.f Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, and usage limitations.

B. Operational Restrictions

1. The maximum annual usage rates for emissions unit K002 shall not exceed 240,000 pounds of coatings, 60,000 pounds of adhesives, and 3,000 pounds of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage In Pounds	Maximum Allowable Cumulative Adhesive Usage In Pounds	Maximum Allowable Cumulative Cleanup Usage In Pounds
1	20,000	5,000	250
1-2	40,000	10,000	500
1-3	60,000	15,000	750
1-4	80,000	20,000	1,000

1-5	100,000	25,000	1,250
1-6	120,000	30,000	1,500
1-7	140,000	35,000	1,750
1-8	160,000	40,000	2,000
1-9	180,000	45,000	2,250
1-10	200,000	50,000	2,500
1-11	220,000	55,000	2,750
1-12	240,000	60,000	3,000

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K002:

   a. The company identification for each coating, adhesive and cleanup material employed;

   b. The VOC content of each coating, adhesive and cleanup material in % by weight VOC , as applied;

   c. The ammonia content of each coating, adhesive and cleanup material in percent by weight, as applied;

   d. The percent VOC by volume of each coating and adhesive (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating and adhesive;

   e. The number of pounds of each coating, adhesive and cleanup material employed;

   f. The updated rolling, 12-month summation of usage rates for the coatings, adhesives, and cleanup materials employed in pounds. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;

   g. The total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];

   h. The updated rolling, 12-month summation for the total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;

   i. The total combined ammonia emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

   a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

   b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, adhesives or cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly reports which specify the rolling 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings, adhesives and cleanup materials used in emission unit K002 for each month. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):

   a. Emission Limitations:
   VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

   Applicable Compliance Method:
   Compliance shall be based upon the recordkeeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method

24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.

b. Emission Limitation:
VOC content of 8.3% by weight for coatings employed;
VOC content of 3.6% by weight for adhesives employed; and
VOC content of 30% by weight for cleanup materials employed.

Applicable Compliance Method:
USEPA Method 24A shall be used to determine the VOC contents of the coatings, adhesives, and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating, 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 alternate analytical procedures or alternative precision statements for Method 24A.

c. Emission Limitation:
4.88 lbs/hr VOC, including cleanup

Applicable Compliance Method:
Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (54.0 lbs/hr, 6.85 lbs/hr, and 0.5 lb/hr respectively) by their maximum allowable VOC contents and adding the results.

d. Emission Limitation:
11.49 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

e. Usage Limitations:
Less than 240,000 pounds coatings per year;
Less than 60,000 pounds adhesives per year; and
Less than 3,000 pounds cleanup materials per year.

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

f. Emission Limitation:
0.44 lb/hr ammonia

Applicable Compliance Method:
Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (54.0 lbs/hr, 6.85 lbs/hr, and 0.5 lb/hr respectively) by their maximum ammonia content (in percent by weight) and adding the results.

g. Emission Limitation:
0.99 TPY ammonia

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ammonia
TLV (ug/m3): 17,410
Maximum Hourly Emission Rate (lbs/hr): 2.77
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 215.1
MAGLC (ug/m3): 415

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.a., A.2.2.b., A.2.2.c., A.2.2.d., A.2.2.e., A.2.2.f., B.1., C.1., D.1., D.2., and E.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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	Applicable Emissions Limitations/Control Measures
Flexographic Printing Press with glue station (Langston Flexographic)	OAC rule 3745-31-05(A)(3)	8.13 lbs/hr VOC, including cleanup. 13.01 TPY VOC 0.74 lb/hr and 1.08 TPY ammonia
	OAC rule 3745-31-05(D)	13.01 TPY VOC, including cleanup, based upon a rolling, 12-month summation See Section A.2.2.c, A.2.2.d, A.2.2.e. and B.1.
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.b.
	OAC rule 3745-15-07	See Part I, Term A.7.

2. Additional Terms and Conditions

2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

2.b The VOC content of each coating and adhesive employed in this emissions unit shall not

exceed the following limitations:

i. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or

ii. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

2.c The VOC content of the coatings employed in this emissions unit shall not exceed 8.3% by weight VOC, as applied.

2.d The VOC content of the adhesives employed in this emissions unit shall not exceed 3.6% by weight VOC, as applied.

2.e The VOC content of the cleanup material employed in this emissions unit shall not exceed 30% by weight VOC.

2.f Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, and usage limitations.

B. Operational Restrictions

1. The maximum annual usage rates for emissions unit K003 shall not exceed 259,200 pounds of coatings, 100,000 pounds of adhesives, and 3,000 pounds of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

   To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage In Pounds	Maximum Allowable Cumulative Adhesive Usage In Pounds	Maximum Allowable Cumulative Cleanup Usage In Pounds
1	21,600	8,333	250
1-2	43,200	16,666	500
1-3	64,800	24,999	750
1-4	86,400	33,332	1,000

1-5	108,000	41,665	1,250
1-6	129,600	49,998	1,500
1-7	151,200	58,331	1,750
1-8	172,800	66,664	2,000
1-9	194,400	74,997	2,250
1-10	216,000	83,330	2,500
1-11	237,600	91,663	2,750
1-12	259,200	100,000	3,000

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K003:

   a. The company identification for each coating, adhesive and cleanup material employed;

   b. The VOC content of each coating, adhesive and cleanup material in % by weight VOC, as applied;

   c. The ammonia content of each coating, adhesive and cleanup material in percent by weight, as applied;

   d. The percent VOC by volume of each coating and adhesive (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating and adhesive;

   e. The number of pounds of each coating, adhesive and cleanup material employed;

   f. The updated rolling, 12-month summation of usage rates for the coatings, adhesives, and cleanup materials employed in pounds. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;

   g. The total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];

h. The updated rolling, 12-month summation for the total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;

i. The total combined ammonia emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, adhesives or cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly reports which specify the rolling, 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings, adhesives and cleanup materials used in emission unit K003 for each month. These quarterly reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitations:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the

volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

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

b. Emission Limitation:
VOC content of 8.3% by weight for coatings employed;
VOC content of 3.6 % by weight for adhesives employed; and
VOC content of 30% by weight for cleanup materials employed.

Applicable Compliance Method:
USEPA Method 24A shall be used to determine the VOC contents of the coatings, adhesives, and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating, 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 alternate analytical procedures or alternative precision statements for Method 24A.

c. Emission Limitation:
8.13 lbs/hr VOC, including cleanup

Applicable Compliance Method:
Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (91.2 lbs/hr, 11.42 lbs/hr, and 0.5 lb/hr respectively) by their maximum allowable VOC contents and adding the results.

d. Emission Limitation:
13.01 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

e. Usage Limitations:
Less than 259,200 pounds coatings per year;
Less than 100,000 pounds adhesives per year; and
Less than 3,000 pounds cleanup materials per year.

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

f. Emission Limitation:
0.74 lb/hr ammonia

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (91.2 lbs/hr, 11.42 lbs/hr, and 0.5 lb/hr respectively) by their maximum ammonia content (in percent by weight) and adding the results.

g. Emission Limitation:
1.08 TPY ammonia

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

   Pollutant: ammonia
   TLV (ug/m3): 17,410
   Maximum Hourly Emission Rate (lbs/hr): 2.77
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 215.1
   MAGLC (ug/m3): 415

   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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

   a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

   b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.a., A.2.2.b., A.2.2.c., A.2.2.d., A.2.2.e., A.2.2.f., B.1., C.1., D.1., D.2., and E.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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	Applicable Emissions Limitations/Control Measures
Flexographic Printing Press (Ward Die Cutter)	OAC rule 3745-31-05(A)(3)	5.23 lbs/hr VOC, including cleanup. 11.26 TPY VOC 0.49 lb/hr and 1.06 TPY ammonia
	OAC rule 3745-31-05(D)	11.26 TPY VOC, including cleanup, based upon a rolling, 12-month summation See Section A.2.2.c., A.2.2.d. and B.1.
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.b.
	OAC rule 3745-15-07	See Part I, Term A.7.

2. Additional Terms and Conditions

2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

2.b The VOC content of each coating employed in this emissions unit shall not exceed the

following limitations:

i. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or

ii. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

2.c The VOC content of the coatings employed in this emissions unit shall not exceed 8.3% by weight VOC, as applied.

2.d The VOC content of the cleanup material employed in this emissions unit shall not exceed 30% by weight.

2.e Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, and usage limitations.

B. Operational Restrictions

1. The maximum annual usage rates for emissions unit K004 shall not exceed 264,000 pounds of coatings, and 2,000 pounds of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage In Pounds	Maximum Allowable Cumulative Cleanup Usage In Pounds
1	22,000	167
1-2	44,000	334
1-3	66,000	501
1-4	88,000	668
1-5	110,000	835
1-6	132,000	1,002
1-7	154,000	1,169
1-8	176,000	1,336
1-9	198,000	1,503

1-10	220,000	1,670
1-11	242,000	1,837
1-12	264,000	2,000

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K004:

   a. The company identification for each coating and cleanup material employed;

   b. The VOC content of each coating and cleanup material in % by weight VOC, as applied;

   c. The ammonia content of each coating and cleanup material in percent by weight, as applied;

   d. The percent VOC by volume of each coating (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating;

   e. The number of pounds of each coating and cleanup material employed;

   f. The updated rolling, 12-month summation of usage rates for the coatings and cleanup materials employed in pounds. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;

   g. The total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];

   h. The updated rolling, 12-month summation for the total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;

   i. The total combined ammonia emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly reports which specify the rolling, 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings, and cleanup materials used in emission unit K004 for each month. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):

   a. Emission Limitations:
   VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

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

   b. Emission Limitation:
   VOC content of 8.3% by weight for coatings employed; and
   VOC content of 30% by weight for cleanup materials employed.

   Applicable Compliance Method:

USEPA Method 24A shall be used to determine the VOC contents of the coatings and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating,

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 alternate analytical procedures or alternative precision statements for Method 24A.

c. Emission Limitation:
5.23 lbs/hr VOC, including cleanup

Applicable Compliance Method:
Compliance is determined by multiplying the maximum hourly usage rates of the coating and cleanup material (61.2 lbs/hr and 0.5 lb/hr respectively) by their maximum allowable VOC contents and adding the results.

d. Emission Limitation:
11.26 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

e. Usage Limitations:
Less than 264,000 pounds coatings per year; and
Less than 2,000 pounds cleanup materials per year.

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

f. Emission Limitation:
0.49 lb/hr ammonia

Applicable Compliance Method:
Compliance is determined by multiplying the maximum hourly usage rates of the coating and cleanup material (61.2 lbs/hr and 0.5 lb/hr respectively) by their maximum ammonia content (in percent by weight) and adding the results.

g. Emission Limitation:
1.06 TPY ammonia

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

Georgia-Pacific Corporation Facility ID: **1413020453**

PTI Application: **14-04806**

Date: Marc

Emissions Unit ID: **K004**

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

   Pollutant: ammonia
   TLV (ug/m3): 17,410
   Maximum Hourly Emission Rate (lbs/hr): 2.77
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 215.1
   MAGLC (ug/m3): 415

   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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

   a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

   b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

   c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

   d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

   The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.a., A.2.2.b., A.2.2.c., A.2.2.d., A.2.2.e., B.1., C.1., D.1., D.2., and E.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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	Applicable Emissions Limitations/Control Measures
Flexographic Printing Press with glue station (Langston Saturn III)	OAC rule 3745-31-05	8.13 lbs/hr VOC, including cleanup. 13.01 TPY VOC 0.74 lb/hr and 1.08 TPY ammonia
	OAC rule 3745-31-05(D)	13.01 TPY VOC, including cleanup, based upon a rolling, 12-month summation See Section A.2.2.c., A.2.2.d, A.2.2.e. and B.1.
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.b.
	OAC rule 3745-15-07	See Part I, Term A.7.

2. Additional Terms and Conditions

2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

2.b The VOC content of each coating and adhesive employed in this emissions unit shall not exceed the following limitations:

i. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or

ii. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

2.c The VOC content of the coatings employed in this emissions unit shall not exceed 8.3% by weight VOC, as applied.

2.d The VOC content of the adhesives employed in this emissions unit shall not exceed 3.6% by weight VOC, as applied.

2.e The VOC content of the cleanup material employed in this emissions unit shall not exceed 30% by weight VOC.

2.f Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, and usage limitations.

B. Operational Restrictions

1. The maximum annual usage rates for emissions unit K005 shall not exceed 259,200 pounds of coatings, 100,000 pounds of adhesives, and 3,000 pounds of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage In Pounds	Maximum Allowable Cumulative Adhesive Usage In Pounds	Maximum Allowable Cumulative Cleanup Usage In Pounds
1	21,600	8,333	250
1-2	43,200	16,666	500
1-3	64,800	24,999	750
1-4	86,400	33,332	1,000
1-5	108,000	41,665	1,250
1-6	129,600	49,998	1,500

1-7	151,200	58,331	1,750
1-8	172,800	66,664	2,000
1-9	194,400	74,997	2,250
1-10	216,000	83,330	2,500
1-11	237,600	91,663	2,750
1-12	259,200	100,000	3,000

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K005:

   a. The company identification for each coating, adhesive and cleanup material employed;

   b. The VOC content of each coating, adhesive and cleanup material in % by weight VOC, as applied;

   c. The ammonia content of each coating, adhesive and cleanup material in percent by weight, as applied;

   d. The percent VOC by volume of each coating and adhesive (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating and adhesive;

   e. The number of pounds of each coating, adhesive and cleanup material employed;

   f. The updated rolling, 12-month summation of usage rates for the coatings, adhesives, and cleanup materials employed in pounds. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;

   g. The total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];

h. The updated rolling, 12-month summation for the total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;

i. The total combined ammonia emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, adhesives or cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly reports which specify the rolling, 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings, adhesives and cleanup materials used in emission unit K005 for each month. These quarterly reports shall be submitted by January 31, April 31, July 31, and October 31 of each year and shall cover the previous calendar quarters.

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitations:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

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

b. Emission Limitation:
VOC content of 8.3% by weight for coatings employed;
VOC content of 3.6% by weight for adhesives employed; and
VOC content of 30% by weight for cleanup materials employed.

Applicable Compliance Method:
USEPA Method 24A shall be used to determine the VOC contents of the coatings, adhesives, and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating,

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 alternate analytical procedures or alternative precision statements for Method 24A.

c. Emission Limitation:
8.13 lbs/hr VOC, including cleanup

Applicable Compliance Method:
Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (91.2 lbs/hr, 11.42 lbs/hr, and 0.5 lb/hr respectively) by their maximum allowable VOC contents and adding the results.

d. Emission Limitation:
13.01 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

e. Usage Limitations:
Less than 259,200 pounds coatings per year;
Less than 100,000 pounds adhesives per year; and,
Less than 3,000 pounds cleanup materials per year.

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

f. Emission Limitation:
0.74 lb/hr ammonia

Applicable Compliance Method:
Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (91.2 lbs/hr, 11.42 lbs/hr, and 0.5 lb/hr respectively) by their maximum ammonia content (in percent by weight) and adding the results.

g. Emission Limitation:
1.08 TPY ammonia

Applicable Compliance Method:
Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

   Pollutant: ammonia
   TLV (ug/m3): 17,410
   Maximum Hourly Emission Rate (lbs/hr): 2.77
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 215.1
   MAGLC (ug/m3): 415

   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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

   a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

   b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

   c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

   d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

   The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

   a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.a., A.2.2.b., A.2.2.c., A.2.2.d., A.2.2.e., A.2.2.f., B.1., C.1., D.1., D.2., and E.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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	Applicable Emissions Limitations/Control Measures
Pneumatic paper scrap collection system with cyclone	OAC rule 3745-31-05(A)(3)	5.46 lbs/hr PM and 13.65 TPY PM 2.73 lbs/hr PM10 and 6.83 TPY PM10
	OAC rule 3745-17-07(A)	See Section A.2.2.a.
	OAC rule 3745-17-11	The emissions limitation established by OAC rule 3745-17-11 is less stringent than OAC rule 3745-31-05 (BAT).
	OAC rule 3745-15-07	See Part I, Term A.7.

2. Additional Terms and Conditions

2.a Visible particulate emissions from the stack for emissions unit P001 shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

2.b The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

2.c Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of a cyclone.

B. Operational Restrictions

1. The maximum annual throughput of scrap paper shall not exceed 26,257 tons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. The throughput of scrap paper for the calendar month, in tons.

   b. The monthly PM emissions, in tons, calculated by multiplying the scrap paper throughput above by an emission factor of 1.04 lbs PM/ton (from cyclone manufacturer data) and by dividing by 2,000 lbs/ton.

   c. The monthly PM10 emissions, in tons, calculated by multiplying the scrap paper throughput above by an emission factor of 0.52 lb PM10/ton (from cyclone manufacturer data) and by dividing by 2,000 lbs/ton.

D. Reporting Requirements

1. The permittee shall submit annual reports to Hamilton County Department of Environmental Services that identify any exceedances of the annual scrap paper throughput limitation, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred, then the permittee shall state so in the report. These reports shall be submitted by January 31 of each year.

2. The permittee shall submit annual reports which specify the total PM/PM10 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 PM/PM10 emission and throughput limits shall be determined by the record keeping and calculation methodology specified in Section C.1.

2. If testing is required to determine compliance with the allowable PM/PM10 emission limitations, then testing shall be conducted using the following methods:

   a. For PM: Method 5 of 40 CFR Part 60, Appendix A shall be used.

   b. For PM10: Method 201 of 40 CFR Part 51, Appendix M shall be used.

3. Compliance with the visible stack particulate emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the

methods and procedures specified in USEPA Reference Method 9.

F. Miscellaneous Requirements

None.