

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **14-05617**

**A. Source Description**

Green Bay Packaging, Inc. has submitted an application to modify a corrugated container-board line (OEPA emissions unit K001) that produces shipping containers. The press will use compliant coatings.

**B. Facility Emissions and Attainment Status**

Green Bay Packaging, Inc. is a fabricator of corrugated container board with combined allowable limits for VOC emissions of 48.18 TPY. To assure non-major source status, the facility has requested federally enforceable limits for VOC and HAP emissions. By including synthetic minor HAPs terms and coating usage limits in this permit, Green Bay Packaging, Inc is an area source relative to MACT rules and a minor source for VOC emissions. The facility is located in Hamilton County which is designated as attainment for PM/PM<sub>10</sub>, SO<sub>2</sub>, and CO and is designated non-attainment for ozone (VOC) and NO<sub>x</sub>.

**C. Source Emissions**

The facility is accepting limits of less than 9.5 TPY for any individual HAP and 24.5 TPY for any combined HAPs emissions and 14.17 TPY for VOC emissions. Emissions unit K001 is permitted for 960 pounds per hour and 95,000 pounds per year of container-board liner coatings, as applied. The facility will maintain monthly usage records and submit quarterly reports to demonstrate compliance with the emission limits.

**D. Conclusion**

The usage and emissions limits mentioned above will prevent this facility from being subject to the MACT rules as a major source, the Emissions Offset Policy, and Title V regulations. Monthly record keeping and quarterly reporting requirements will be used to demonstrate compliance.



**HAMILTON COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05617 FOR AN AIR CONTAMINANT SOURCE FOR  
Green Bay Packaging, Inc.**

On 11/4/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Green Bay Packaging, Inc.**, located at **7660 School House Road, Cincinnati, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05617:

**Corrugated fiberboard fabrication line.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy,  
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 14-05617**

Application Number: 14-05617  
Facility ID: 1431320434  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Green Bay Packaging, Inc.  
Person to Contact: Brian Duffy  
Address: 19017  
Green Bay, WI 54307-9017

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**7660 School House Road  
Cincinnati, Ohio**

Description of proposed emissions unit(s):  
**Corrugated fiberboard fabrication line.**

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

Green Bay Packaging, Inc.

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PTI Application: 14-05617

Issued: To be entered upon final issuance

**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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

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

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

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

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is

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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**

**Pollutant**  
VOC

**Tons Per Year**  
14.17

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**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>
K001 - Corrugated fiberboard fabrication line	OAC rule 3745-31-05(A)(5)
	OAC rule 3745-21-09(F)
	OAC rule 3745-31-05(C)

Applicable Emissions  
Limitations/Control Measures

emission limitation established  
pursuant to OAC rule  
3745-31-05(A)(3).

VOC emissions shall not exceed 39.74 lbs/hr from the application of container board liner coatings.

VOC emissions shall not exceed 2.56 lbs/hr and 11.21 tons per year (TPY) from the application of corrugated container board and starch adhesives.

VOC emissions shall not exceed 1.04 lbs/hr for knife blade lubricant.

See terms and conditions A.2.b, A.2.e, A.2.f, and B.3.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C)

VOC emissions shall not exceed 1.97 TPY, based upon a rolling, 12-month summation from the application of container board liner coatings.

VOC emissions shall not exceed 0.99 TPY, based upon a rolling, 12-month summation for knife blade lubricant use.

See terms and conditions A.2.b, A.2.c, A.2.d, B.1, and B.2.

The emission limitation specified by this rule is less stringent than the

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of compliance coatings, the use of non-photochemically reactive material for the knife blade lubricant, material usage limits and emission limits.

**2.b** The VOC content of the container-board liner coatings employed in emissions unit K001 shall not exceed 0.0414 pound VOC per pound substrate liner coating (4.14 % by weight), as applied. The density of the container-board liner coatings shall not exceed 10.42 lbs./gallon.

The permittee has existing records to demonstrate compliance with the limitations in term A.2.b.

**2.c** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Paper coating line for corrugated shipping containers), K002 [Sheet-fed flexographic printing press with folder/gluer (PTI 14-4040)], K003 [Sheet-fed flexographic printing press with folder/gluer (PTI 14-4819)], P002 (Corrugator mixing tank), R002 (Langston flexographic press with folder/gluer), and R004 (United rotary press with die cutter) shall not exceed 9.5 TPY for any single HAP and 24.5 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with the limitations in term A.2.c. upon permit issuance.

**2.d** The VOC content of the knife blade lubricant shall not exceed of 6.94 pounds VOC per gallon.

**2.e** The corrugator line maximum operating rate of 320 MSF per hour and the corresponding pound per hour and ton per year emissions for the container board and starch adhesive are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly and annual records are required to demonstrate compliance with the corrugated container board limits and starch adhesive limits.

**2.f** The hourly emission limitations for substrate liner coatings and knife blade coating are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

**B. Operational Restrictions**

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1. The maximum annual container board liner coating usage for emissions unit K001 shall not exceed 95,000 pounds per year, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has existing records to demonstrate compliance with the limitations in term B.1. upon permit issuance.

2. The maximum annual knife blade lubricant usage for emissions unit K001 shall not exceed 3998 pounds per year, based upon a rolling, 12-month summation of the usage figures.

The permittee has existing records to demonstrate compliance with the limitations in term B.2. upon permit issuance.

3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) for the knife blade lubricant is prohibited.

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

1. The permittee shall collect and record the following information each month for emissions unit K001:
  - a. The name and identification number of each container-board liner coating and knife blade lubricant employed;
  - b. The VOC content of each container-board liner coating, by weight, as applied;
  - c. The quantity of the container-board liner coatings employed, in pounds;
  - d. The VOC content of each knife blade lubricant, in percent by weight and pounds per gallon, as applied;
  - e. The quantity of each knife blade lubricant employed, in pounds;
  - f. The density of each container-board liner coatings, in pounds per gallon;
  - g. The total VOC emission rate for all container-board liner coatings employed, in pounds per month [b x c];
  - h. The total VOC emission rate for all knife blade lubricant employed, in pounds per month [d x e];

**Emissions Unit ID: K001**

- i. The VOC emissions from the application of corrugated container board and starch adhesives as calculated in term E.1.a;
  - j. The updated rolling, 12-month summation of the container-board liner coatings usage, in pounds;
  - k. The updated rolling, 12-month summation of the knife blade lubricant usage, in pounds;
  - l. The updated rolling, 12-month summation of the VOC emissions for the container-board liner coatings, in tons per year; and
  - m. The updated rolling, 12-month summation of the VOC emissions for the knife blade lubricants, in tons per year.
2. The permittee shall collect and record the following information each month for emissions units K001 (Paper coating line for corrugated shipping containers), K002 [Sheet-fed flexographic printing press with folder/gluer (PTI 14-4040)], K003 [Sheet-fed flexographic printing press with folder/gluer (PTI 14-4819)], P002 (Corrugator mixing tank), R002 (Langston flexographic press with folder/gluer), and R004 (United rotary press with die cutter),
- a. The name and identification number of each coating employed;
  - b. The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each coating in pounds of individual HAP per pound of coating, as applied;
  - c. The total combined HAP content of each coating in pounds of combined HAPs per pound of coating, as applied [sum all the individual HAP contents from (b)];
  - d. The number of pounds of each coating employed;
  - e. The name and identification of each cleanup material employed;
  - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleanup material employed;
  - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials

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employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times the emissions factor (if applicable) for each coating plus the sum of (f) times (h) for each cleanup material];

- j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times the emissions factor (if applicable) for each coating plus the sum of (g) times (h) for each cleanup material];
- k. The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Hamilton County Department of Environmental Services. This information does not have to be kept on a individual emissions unit basis.

3. The permittee shall collect and record the following information each month:
  - a. the company identification of each liquid organic material employed for the knife blade lubricant in this emissions unit; and
  - b. a record of each liquid organic material employed as knife blade lubricant in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

**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 as outlined in terms and condition A.2.b. and A.2.d. 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. For each exceedance the permittee shall also identify if an exceedance of the applicable VOC emissions limit(s) occurred.
2. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.c. If no deviations occurred during the reporting period, the permittee shall state so in the report.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months ( October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

3. The permittee shall submit quarterly deviation reports which identify any exceedance of the rolling, 12-month coating and lubricant usage limitations in term B.1 and B.2.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed as knife blade lubricant in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. 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.
5. The permittee shall submit annual reports which summarize the VOC emissions from emissions unit K001 for the previous calendar year. The reports shall be submitted by January 31 of each year.

## **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1.of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
 VOC emissions shall not exceed 39.74 lbs/hr from the application of container board liner coatings.  
 VOC emissions shall not exceed 2.56 lbs/hr from the application of corrugated container board and starch adhesives.

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Applicable Compliance Method:

The VOC emissions rate was based on the following calculation method:

$$E_{\text{container-board liner coatings}} = A * F$$

A = actual weight of coatings employed, in pounds

F = actual % by weight VOC content of the coatings, in pounds VOC/pound coating

Permit limit based on 3 lbs coating/MSF \* (800 fpm) \* (80 inches/12inches) \* (60 min/hr)  
\* 0.0414 lb. VOC/lb coating = 39.74 lbs/hr,

where MSF = 1000 square feet

$$E_{\text{container board + starch adhesive coatings}} = A * F$$

A = actual corrugator operation rate, in 1000 SF / hour (MSF/hour)

F = for the container board + starch adhesive coating is 0.008 lbs. VOC / MSF.

Permit limit based on 320 MSF/hour \* 0.008 lb. VOC / MSF= 2.56 lbs/hour

## b. Emission Limitation:

VOC emissions shall not exceed 1.97 TPY, based upon a rolling, 12-month summation from the application of container board liner coatings.

VOC emissions shall not exceed 11.21 TPY from the application of corrugated container board and starch adhesives.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in Section C.1.

Annual emissions for the starch coatings and corrugated substrate are based on the potential to emit for each material employed.

$$E_{\text{container board liner coatings}} = A \times F \times 0.0005 \text{ tons/lb}$$

E is the VOC emission rate in tons

A is the annual materials employed in pounds

F is the emissions factor for the coating, in lbs VOC/lb. coating

Permit limit is based on [95,000 lbs/year \* 0.0414 lb. VOC/lb. coating] \* 0.0005 = 1.97  
TPY

$$E_{\text{containerboard + starch adhesives}} = A \times F \times 0.0005 \text{ tons/lb}$$

A = actual corrugator operation rate, in 1000 SF / year (MSF/year)

F for the corrugated substrate is 0.008 lbs. VOC/1000 SF.

Permit limit, based on data in PTI application 14-05617 received on September 10, 2004, is 2,803,200 MSF/yr \* 0.008 lb. VOC/MSF = 11.21 TPY VOC

## c. Emission Limitation:

Emissions Unit ID: **K001**

9.5 TPY for any single HAP and 24.5 TPY for combined HAPs per term and condition A.2.c.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be determined by the record keeping requirements specified in term and condition C.2.

d. Emissions limitation

VOC emissions shall not exceed 1.04 lbs/hr for knife blade lubricant.

VOC emissions shall not exceed 0.99 TPY, based upon a rolling, 12-month summation for knife blade lubricant use.

Applicable Compliance Method:

Compliance with the VOC emission limitations will be determined by the record keeping requirements specified in term and condition C.1. Permit limit, based on data in PTI application 14-05617 received on September 10, 2004, is (48 gallons/month \* 6.94 lbs/gallon \* 50%, by weight, of knife blade lubricant is VOC) = 166.56 lbs. VOC/month/160 hours/mo. = 1.04 lbs/hour

= 166.56 lbs. VOC/month \* 12 mo./yr /2000 lb/ton = 0.99 TPY

e. Emissions limitation

0.0414 lb. VOC/pound substrate liner coating

6.94 lb VOC/gallon of knife blade coating

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, the permittee 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.

2. Material Usage Limitations

95,000 pounds of container-board liner coatings per year;

3998 pounds of knife blade lubricants per year;

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Compliance with the material usage limitations shall be demonstrated by the record keeping in terms and conditions C.1.

**3. Material Usage Limitations**

Material usage restricted to non-photochemically reactive materials for knife blade coating.

**Applicable Compliance Method**

Compliance with the operational restriction in term and condition B.3. shall be demonstrated by the record keeping as specified in term and condition C.3.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: A. through E.
2. The terms and conditions in this permit to install supercede permit to install 14-3413, as issued on November 2, 1994.
3. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary for the HAPs at this facility because the emissions unit's annual emissions for each toxic compound will be limited to less than 1.0 ton. The permittee is hereby advised that if the individual HAPs emissions exceed 1.0 ton per year, the permittee shall notify this agency in writing and shall perform air toxics modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy."