



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL  
WARREN COUNTY**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-04974**

**DATE: 8/8/2000**

Dopaco Inc  
Phoebe C Robb  
100 Arrandale Boulevard  
Exton, PA 19341

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Very truly yours,

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

cc: USEPA

HCDES



**Permit To Install**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**FINAL PERMIT TO INSTALL 14-04974**

Application Number: 14-04974  
APS Premise Number: 1483020331  
Permit Fee: **\$200**  
Name of Facility: Dopaco Inc  
Person to Contact: Phoebe C Robb  
Address: 100 Arrandale Boulevard  
Exton, PA 19341

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**300 Industry Drive**  
**Carlisle Ohio, Ohio**

Description of proposed emissions unit(s):  
**Modification of flexographic printing press K008.**

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

**Dopaco Inc**  
**PTI Application: 14-04974**  
**Issued: 8/8/2000**

**Facility ID: 1483020331**

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

**Dopaco Inc****PTI Application: 14-04974****Issued: 8/8/2000****Facility ID: 1483020331**

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.

**Dopaco Inc**  
**PTI Application: 14-04974**  
**Issued: 8/8/2000**

**Facility ID: 1483020331**

**14. Construction Compliance Certification**

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

**15. Fees**

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	4.12

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
K008 - 4-Color Flexographic Printing Press - <b>Modification</b>	OAC rule 3745-31-05(A)(3)	1.0 lb. VOC/hr, coating only* 4.12 TPY VOC  See terms A.2.a - A.2.c.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a)(i)
	OAC rule 3745-21-09 (Y)(1)(a)(i)	The VOC content of each ink shall not exceed 40 percent VOC by volume of the ink, excluding water and exempt solvents.  * The hourly emission limitation is based upon the emission unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of water based coatings and compliance with usage and VOC content limits.

- 2.b** The VOC content of each ink employed in emissions unit K008 shall not exceed 0.59 pound of VOC per gallon of ink, including water and exempt solvents.
- 2.c** The VOC content of each cleanup material employed in emissions unit K008 shall not exceed 1.0 pound of VOC per gallon of cleanup material.

## **B. Operational Restrictions**

1. The maximum annual ink usage for emissions unit K008 shall not exceed 13,350 gallons per year, including water and exempt solvents.
2. The maximum annual organic cleanup material usage for emissions unit K008 shall not exceed 1159 gallons per year.
3. To ensure that the evaporative OC/VOC loss from the hand cleanup process does not exceed more than 75% (by weight) from solvents having a vapor pressure greater than 10 mmHg (0.19 psia) at 20 degrees Celsius (68 degrees Fahrenheit), all rags utilized in the cleanup process shall be stored in containers with tight fitting covers.

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

1. The permittee shall maintain monthly records of the following information for emissions unit K008:
  - a. The name and identification number of each ink and cleanup material employed.
  - b. The number of gallons of each ink (including water and exempt solvents), employed.
  - c. The VOC content of each ink in pounds per gallon (including water and exempt solvents), as applied.
  - d. The percent VOC by volume of the ink, excluding water and exempt solvents.
  - e. The number of gallons of each cleanup material employed.
  - f. The VOC content of each cleanup material, in pounds per gallon.
  - g. The total VOC emissions from all inks and cleanup materials employed, in pounds [(b x c) + (e x f)].

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

1. The permittee shall notify Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying inks 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 annual reports which identify any exceedances of the annual ink and cleanup material usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 30 of each year.

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

1. USEPA methods 24 and 24A shall be used to determine the VOC content for flexographic printing lines and related inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
2. Compliance with the VOC emissions limitations shall be demonstrated by using the following emission factors (EF) where applicable:
  - a. lbs/hr VOC emissions limit - the actual ink usage (gal/hr including water and exempt solvents) multiplied by the actual ink VOC content (lbs VOC/gal including water and exempt solvents) multiplied by the EF from Supplement to OEPA Engineering Guide #56 (0.93 lb VOC emitted/lb VOC input); and
  - b. TPY VOC emissions limit - the summation of the actual VOC emissions from all inks [actual gal/yr including water and exempt solvents multiplied by the actual VOC content (lbs VOC/gal) including water and exempt solvents multiplied by the EF (0.93 lb VOC emitted/lb VOC input)]  
  
plus  
  
the summation of the actual VOC emissions from all cleanup materials [actual gal/yr multiplied by the actual VOC content (lbs VOC/gal) multiplied by the EF from Term and Condition B.3. (0.75 lb VOC emitted/lb VOC input)] then divided by 2000 lbs/ton.

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3. Compliance with the usage limitations in term B.1 and B.2 shall be determined by the recordkeeping in term C.1.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this permit to install(PTI) shall supersede the terms and conditions of PTI 14-2574 for emissions unit K008.

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04974 Facility ID: 1483020331

FACILITY NAME Dopaco Inc

FACILITY DESCRIPTION Modification of flexographic printing press CITY/TWP Carlisle Ohio  
K008

SIC CODE 2657 SCC CODE 4-05-003-12 EMISSIONS UNIT ID K008

EMISSIONS UNIT DESCRIPTION 4-Color Flexographic Printing Press

DATE INSTALLED upon issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds		0.7	2.84	1.0	4.12
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of water based coatings and compliance with usage and VOC content limits.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04974

Facility ID: 1483020331

FACILITY NAME Dopaco Inc

FACILITY DESCRIPTION Modification of flexographic printing press  
K008

CITY/TWP

Carlisle Ohio

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

PTI 14-04974

Premise No. 1483020331

Dopaco, Inc.  
300 Industry Drive  
Carlisle, Ohio 45005

This permit allows Dopaco, Inc. to modify a 4-color flexographic press at the Carlisle, Ohio facility. The modification to the press will increase the speed at which it operates therefore increasing the VOC emissions minimally. The facility manufactures paperboard containers for the fast food industry. Dopaco uses water-based inks in emissions unit K008. The facility currently operates ten various T-status presses at the facility.

VOC emissions occur from a single round stack associated with the emissions unit. Dopaco operates a dryer for emissions unit K008. The following applicable regulations govern this emissions unit:

OAC rules 3745-21-09(Y)(1)(a)(i) and 31-05(BAT). BAT requires the use of water-based coatings which comply with OAC rule 3745-21-09(Y)(1)(a)(i) and compliance with usage and VOC content limits.

The VOC content of each ink complies with the requirement of 21-09(Y)(1)(a)(i). Each ink has a VOC content of less than 40% by volume excluding water.

K008 was previously permitted to emit 0.22 lb/hr VOC and 0.90 TPY VOC. The new emission limits are as follows:

Actual VOC emissions: 0.7 lb VOC/hr, 2.84 TPY VOC including cleanup.

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04974 Facility ID: 1483020331

FACILITY NAME Dopaco Inc

FACILITY DESCRIPTION	Modification of flexographic printing press K008	CITY/TWP	Carlisle Ohio
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Potential VOC emissions: 1.0 lb VOC/hr, 4.12 TPY VOC including cleanup.

The lbs/hr VOC emissions limitation in this PTI is based upon the maximum hourly production rate. Therefore, this permit does not require hourly records.

The OEPA Air Toxics Policy does not apply since the emissions from each air toxic is less than 1.0 TPY. The facility-wide HAPs PTE does not exceed the major source thresholds.

HCDES recommends approval of this final PTI.

Permit Fee: \$200 (PWR < 1,000 lbs/hr)

Prepared by: Tom Wittekind

Date prepared: July 6, 2000

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

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

Pollutant  
VOC

Tons Per Year  
4.12

**NEW SC**

PTI Num

**FACILITY**

FACILITY DESCRIPTION

Modification of flexographic printing press  
K008

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CITY/TWP

Emissions Unit ID: **K008** \_\_\_\_\_

Carlisle Ohio

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