

Synthetic Minor Determination and/or Netting Determination

Permit To Install 14-05095

A. Source Description

The modification to this Major Source, through PTI 14-05095, may necessitate Prevention of Significant Deterioration (PSD) review of the permit. Sonoco has claimed emissions credits for actual OC emissions changes (**reductions**) from the result of emissions units shutdown and removed from the facility (emissions units K001, K006 and K007). The permittee has requested Federally Enforceable limits, per OAC rule 3745-31-05(D), as part of this permit application (Synthetic Minor requirements for K011).

B. Facility Emissions and Attainment Status

Warren County, Ohio is classified as "attainment" for ozone. Sonoco Flexible Packaging is classified as a Major Source of VOC (OC) emissions and Hazardous Air Pollutants (HAPs) since the Potential to Emit (PTE) VOC is greater than 250 TPY and the PTE HAPs is greater than 10 TPY and 25 TPY.

The PTE VOCs from the existing Rotomec #3 press (K005) and the existing Black Clawson extruder/laminator (K008) are not increased by the modification pursuant to PTI 14-05095. Neither have the PTEs for these emissions units changed since the initial permitting action (PTI 18-025 for K005; PTI 14-2440 for K008). Therefore, since no creditable increase is noted for these emissions units, they are not included in the Netting calculations.

C. Source Emissions

Emissions Credits

<u>Emissions Unit</u>	<u>1997 OC Emissions(tons)*</u>	<u>1998 OC Emissions(tons)*</u>	<u>2-Year Avg.</u>
K001	7.70	4.30	6.00
K006	8.10	14.30	11.20
K007	2.90	2.60	2.75
		2-Year Avg. Total (TPY)	19.95

*Based on Title V fee emissions reports.

New Emissions

<u>Emissions Unit</u>	<u>Potential to Emit OC (TPY)</u>	<u>Basis</u>
K010	13.32	PTI 14-05095
K011	45.0	PTI 14-05095 (Synthetic Minor)
New Total (TPY)	58.32 (Synthetic Minor - K011)	

Net Emissions Increase from Addition of New Emissions Units

58.32 TPY OC - 19.95 TPY OC = 38.37 TPY OC, new emissions

D. Conclusion

The emission credits appear to be creditable based on the facts that: they occurred within the last 5 years and before the proposed emissions increase, they are federally enforceable (Title V Fee Emissions Report), and they are actual emissions. Since the net emissions increase due to the modification (the

addition of emissions units K010 and K011) is less than 40 TPY, which is the Significant Emission Rate for VOC emissions, the modification (PTI 14-05095) is not subject to PSD review. The permittee shall maintain records and submit reports to demonstrate compliance with the Synthetic Minor requirements for K011.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
WARREN COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 14-05095

DATE: 8/21/2001

Sonoco Flexible Packaging, Inc.
Jeff Cheak
708 South Avenue
Franklin, OH 450053654

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

HCDES

Ohio-Kentucky-Indiana Reg Coun of Gov

KY

IN



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**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 14-05095

Application Number: 14-05095
APS Premise Number: 1483040077
Permit Fee: **To be entered upon final issuance**
Name of Facility: Sonoco Flexible Packaging, Inc.
Person to Contact: Jeff Cheak
Address: 708 South Avenue
Franklin, OH 450053654

Location of proposed air contaminant source(s) [emissions unit(s)]:

**708 South Avenue
Franklin, Ohio**

Description of proposed emissions unit(s):

Chapter 31 Modification to K005, K008, and L001; installation of new emissions units K010 and K011.

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

Sonoco Flexible Packaging, Inc.

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PTI Application: 14-05095

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

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B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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

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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.

6. 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 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.

7. 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.

8. 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).

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9. 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.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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	166.8

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Sonoco

PTI A

Emissions Unit ID: K005

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Sonoco
PTI A

Emissions Unit ID: K005

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
K005 - Rotomec No.3 8-station rotogravure printing press with permanent total enclosure and catalytic oxidizer	OAC rule 3745-31-05(A)(3)	28.2 lbs/hr VOC emissions 94.7 TPY VOC emissions The permittee shall operate an emissions capture system at a minimum capture efficiency of 100% and a control device (catalytic oxidizer) at a minimum overall control efficiency of 95% for VOC emissions. The requirements of this rule also include compliance the requirements of 40 CFR 63 Subpart KK.
	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63 Subpart KK	The permittee shall operate a capture system and control device (catalytic oxidizer) at a minimum overall control efficiency of 95% for Hazardous Air Pollutants (HAPs).

Emissions Unit ID: K005

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control efficiency for VOC emissions, operation of an emissions capture and control system capable of 95% overall control efficiency for HAPs emissions, and compliance with hourly and annual VOC emissions limitations.
- 2.b** The hourly VOC emissions limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** Any excursion(s) from the required operating parameters which are monitored in accordance with sections A.III.1 and A.III.2., unless otherwise excused, shall be considered a violation(s) of the control measures pursuant to OAC rule 3745-31-05(A)(3) outlined in section A.1.

II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a three-hour average, whenever the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee operating each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance through performance tests of control device efficiency and continuing compliance through continuous monitoring of control device operating parameters, shall install, calibrate, operate and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius or +/- 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

The permittee shall collect and record the following information each day;

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.

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- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operate chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

2. The permittee shall install, maintain and operate monitoring device(s) and a recorder which simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all three-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a three-hour average.

3. The owner or operator of each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:
 - a. submit to the Administrator with the compliance status report required by 40 CFR 63.9(h) of the General Provisions, a plan that identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained and discuss why this parameter is appropriate for demonstrating ongoing compliance, and identifies the specific monitoring procedures;
 - b. set the operating parameter value, or range of values, that demonstrate compliance with 40 CFR 63.824 - 63.825; and
 - c. conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require an alternate monitoring scheme.
4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.

- b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The name and identification of each cleanup material employed.
 - 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 uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons.
 - h. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
5. The permittee shall maintain records documenting the overall organic HAP efficiency as required in 40 CFR 63.825(d).

IV. Reporting Requirements

1. Within 120 days after issuance of this permit, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to 40 CFR 63 Subpart KK. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - a. The name and mailing address of the permittee;
 - b. The physical location of the source if it is different from the mailing address;
 - c. Identification of the relevant MACT standard and the permittee's compliance date;
 - d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
2. Within 60 days following completion of the required compliance determination activity specified in the 40 CFR 63 Subpart KK, the permittee shall submit a notification of compliance status that contains the following information:

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- a. The methods used to determine compliance;
 - b. The results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. The methods that will be used for determining compliance, including a description of the monitoring and reporting requirements and test methods;
 - d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart KK;
 - e. An analysis demonstrating whether the affected source is a major source or an area source;
 - f. A description of the air pollution control equipment or method of each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - g. A statement as to whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart KK.
3. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed were less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.
- The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.
4. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inch of water, as a three-hour average.
- The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.
5. The permittee shall submit annual reports which specify the total volatile organic compounds emissions from emissions unit K005 for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Control Requirements and Emissions Limitation

95% overall control efficiency for VOC emissions
95% overall control efficiency for HAPs emissions
28.2 lbs/hr VOC emissions

The permittee shall conduct an initial performance test within 180 days after issuance of this permit to establish the destruction efficiency of the catalytic oxidizer and the associated catalyst bed inlet temperature for the catalytic oxidizer and to determine compliance with the VOC mass emissions limitation in accordance with the following reference methods and procedures:

- a. Method 1 or 1A of 40 CFR part 60, Appendix A for sample and velocity traverses to determine sampling locations;
- b. Method 2, 2A, 2C, or 2D of 40 CFR part 60, Appendix A to determine gas volumetric flow rate;
- c. Method 3 of 40 CFR part 60, Appendix A for gas analysis to determine dry molecular weight;
- d. Method 4 of 40 CFR part 60, Appendix A to determine stack gas moisture;
- e. Method 25 of 40 CFR part 60, Appendix A to determine organic volatile matter concentration, except as provided in 40 CFR 63.827(d)(1)(vi)(A) - (C). The owner or operator shall submit notice of the intended test method to the Administrator for approval along with notice of the performance test required under 40 CFR 63.7(c). The owner or operator may use Method 25A of 40 CFR 60, Appendix A if:
 - i. an exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required;
 - ii. the organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or
 - iii. because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

The permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

Emissions Unit ID: K005

For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For a catalytic oxidizer, the permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. This minimum temperature is the operating parameter value that demonstrates compliance continuing compliance with the control requirement in section A.I.1.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

2. Control Requirement

100% emissions capture

The permittee shall conduct a performance test within 180 days after issuance of this permit to determine the capture efficiency of each capture system venting organic emissions to a control device. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.

The capture efficiency shall be determined using Methods 204 through 204F as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

As an alternative to the above procedure, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in Appendix A of this subpart. The permittee may

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exclude never-controlled work stations from such capture efficiency determinations.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Emissions Limitation

94.7 TPY VOC

Compliance with the annual VOC emissions limitation pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the summation of the following equations:

actual ink usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from inks;

actual thinner usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from thinners;

actual coating usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from coatings; and

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actual cleanup material usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from cleanup materials.

VI. Miscellaneous Requirements

1. The permittee shall develop and implement a startup, shutdown and malfunction plan as required in 40 CFR Part 63.6(e)(3).
2. The start up of emissions unit K010 and K011, OEPA premise number 1483040077 shall be concurrent with the complete and permanent shutdown of Ohio EPA emissions units K001, K006 and K007, OEPA premise number 1483040077.

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B. State Only Enforceable Section

I. 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>
K005 - Rotomec No.3 8-station rotogravure printing press with permanent total enclosure and catalytic oxidizer	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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None

Emissions Unit ID: K005

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Emissions Unit ID: K008

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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 - Black Clawson 2-station extruder/laminator with permanent total enclosure and catalytic oxidizer	OAC rule 3745-31-05(A)(3)	2.15 lbs/hr VOC emissions 9.43 TPY VOC emissions from coatings 3.89 TPY VOC emissions from cleanup materials.
		The permittee shall operate an emissions capture system at a minimum capture efficiency of 100% and a control device (catalytic oxidizer) at a minimum overall control efficiency of 95% for VOC emissions.
		The requirements of this rule also include compliance the requirements of 40 CFR 63 Subpart KK.
	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63 Subpart KK	Pursuant to 40 CFR 63.821 (a)(3)(i)(C), this emissions unit employs a control device, for organic HAP emissions, common to one or more product and

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Emissions Unit ID: K008

packaging rotogravure presses .

Therefore, the permittee shall operate a capture system and control device (catalytic oxidizer) at a minimum overall control efficiency of 95% for Hazardous Air Pollutants (HAPs).

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control efficiency for VOC emissions, operation of an emissions capture and control system capable of 95% overall control efficiency for HAPs emissions, and compliance with hourly and annual VOC emissions limitations.
- 2.b** The hourly VOC emissions limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** Any excursion(s) from the required operating parameters which are monitored in accordance with sections A.III.1. and A.III.2., unless otherwise excused, shall be considered a violation(s) of the control measures pursuant to OAC rule 3745-31-05(A)(3) outlined in section A.1.

II. Operational Restrictions

- 1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.
- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a three-hour average, whenever the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee operating each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance through performance tests of control device efficiency and continuing compliance through continuous monitoring of control device operating parameters, shall install, calibrate, operate and

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maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius or +/- 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

The permittee shall collect and record the following information each day;

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operate chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

2. The permittee shall install, maintain and operate monitoring device(s) and a recorder which simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all three-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a three-hour average.

3. The owner or operator of each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:
 - a. submit to the Administrator with the compliance status report required by 40 CFR 63.9(h) of the General Provisions, a plan that identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained and discuss why this parameter is appropriate for demonstrating ongoing compliance, and

- identifies the specific monitoring procedures;
- b. set the operating parameter value, or range of values, that demonstrate compliance with 40 CFR 63.824 - 63.825; and
 - c. conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require and alternate monitoring scheme.
4. The permittee shall collect and record the following information each month for this emissions unit:
- a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The name and identification of each cleanup material employed.
 - e. The number of gallons of each cleanup material evaporated.
 - f. The VOC content of each cleanup material, in pounds per gallon.
 - g. The total uncontrolled VOC emissions from all coatings employed, in pounds or tons.
 - h. The total uncontrolled VOC emissions from all cleanup materials employed, in pounds or tons.
 - i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
5. The permittee shall maintain records documenting the overall organic HAP efficiency as required in 40 CFR 63.825(d).

IV. Reporting Requirements

1. Within 120 days after issuance of this permit, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to 40 CFR 63 Subpart KK. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - a. The name and mailing address of the permittee;
 - b. The physical location of the source if it is different from the mailing address;

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- c. Identification of the relevant MACT standard and the permittee's compliance date;
 - d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
2. Within 60 days following completion of the required compliance determination activity specified in the 40 CFR 63 Subpart KK, the permittee shall submit a notification of compliance status that contains the following information:
 - a. The methods used to determine compliance;
 - b. The results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. The methods that will be used for determining compliance, including a description of the monitoring and reporting requirements and test methods;
 - d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart KK;
 - e. An analysis demonstrating whether the affected source is a major source or an area source;
 - f. A description of the air pollution control equipment or method of each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - g. A statement as to whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart KK.
3. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed were less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.

The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.

4. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inch of water, as a three-hour average.

The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.

V. Testing Requirements

1. Control Requirements and Emissions Limitation

95% overall control efficiency for VOC emissions
 95% overall control efficiency for HAPs emissions
 2.15 lbs/hr VOC emissions

The permittee shall conduct an initial performance test within 180 days after issuance of this permit to establish the destruction efficiency of the catalytic oxidizer and the associated catalyst bed inlet temperature for the catalytic oxidizer and to determine compliance with the VOC mass emissions limitation in accordance with the following reference methods and procedures:

- a. Method 1 or 1A of 40 CFR part 60, Appendix A for sample and velocity traverses to determine sampling locations;
- b. Method 2, 2A, 2C, or 2D of 40 CFR part 60, Appendix A to determine gas volumetric flow rate;
- c. Method 3 of 40 CFR part 60, Appendix A for gas analysis to determine dry molecular weight;
- d. Method 4 of 40 CFR part 60, Appendix A to determine stack gas moisture;
- e. Method 25 of 40 CFR part 60, Appendix A to determine organic volatile matter concentration, except as provided in 40 CFR 63.827(d)(1)(vi)(A) - (C). The owner or operator shall submit notice of the intended test method to the Administrator for approval along with notice of the performance test required under 40 CFR 63.7(c). The owner or operator may use Method 25A of 40 CFR 60, Appendix A if:
 - i. an exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required;
 - ii. the organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter

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concentrations of 50 ppmv or less; or

- iii. because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

The permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For a catalytic oxidizer, the permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. This minimum temperature is the operating parameter value that demonstrates compliance continuing compliance with the control requirement in section A.I.1.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

2. Control Requirement

100% emissions capture

Emissions Unit ID: K008

The permittee shall conduct a performance test within 180 days after issuance of this permit to determine the capture efficiency of each capture system venting organic emissions to a control device. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.

The capture efficiency shall be determined using Methods 204 through 204F as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

As an alternative to the above procedure, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in Appendix A of this subpart. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Emissions Limitation

9.43 TPY VOC emissions from coatings
3.89 TPY VOC emissions from cleanup materials.

Compliance with the annual VOC emissions limitation pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the summation of the following equations:

actual ink usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the

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most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from inks;

actual thinner usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from thinners;

actual coating usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from coatings; and

actual cleanup material usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from cleanup materials.

VI. Miscellaneous Requirements

1. The permittee shall develop and implement a startup, shutdown and malfunction plan as required in 40 CFR Part 63.6(e)(3).
2. The start up of emissions unit K010 and K011, OEPA premise number 1483040077 shall be concurrent with the complete and permanent shutdown of Ohio EPA emissions units K001, K006 and K007, OEPA premise number 1483040077.

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Emissions Unit ID: K008

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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 - Black Clawson 2-station extruder/laminator with permanent total enclosure and catalytic oxidizer	None	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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None

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Emissions Unit ID: K010

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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>
K010 - 2-station extruder/laminator with permanent total enclosure and catalytic oxidizer	OAC rule 3745-31-05(A)(3)	2.15 lbs/hr VOC emissions 9.43 TPY VOC emissions from coatings. 3.89 TPY VOC emissions from cleanup materials. The permittee shall operate an emissions capture system at a minimum capture efficiency of 100% and a control device (catalytic oxidizer) at a minimum overall control efficiency of 95% for VOC emissions. The requirements of this rule also include compliance the requirements of 40 CFR 63 Subpart KK.
	OAC rule 3745-21-09(Y)(1)(b)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63 Subpart KK	Pursuant to 40 CFR 63.821 (a)(3)(i)(C), this emissions unit employs a control device, for organic HAP emissions, common to one or more product and

packaging rotogravure presses .

Therefore, the permittee shall operate a capture system and control device (catalytic oxidizer) at a minimum overall control efficiency of 95% for Hazardous Air Pollutants (HAPs).

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control efficiency for VOC emissions, operation of an emissions capture and control system capable of 95% overall control efficiency for HAPs emissions, and compliance with hourly and annual VOC emissions limitations.
- 2.b** The hourly VOC emissions limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** Any excursion(s) from the required operating parameters which are monitored in accordance with sections A.III.1. and A.III.2., unless otherwise excused, shall be considered a violation(s) of the control measures pursuant to OAC rule 3745-31-05(A)(3) outlined in section A.1.

II. Operational Restrictions

- 1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.
- 2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a three-hour average, whenever the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee operating each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance through performance tests of control device efficiency and continuing compliance through continuous monitoring of control device operating parameters, shall install, calibrate, operate and

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maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius or +/- 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

The permittee shall collect and record the following information each day;

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operate chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

2. The permittee shall install, maintain and operate monitoring device(s) and a recorder which simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all three-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a three-hour average.

3. The owner or operator of each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:
 - a. submit to the Administrator with the compliance status report required by 40 CFR 63.9(h) of the General Provisions, a plan that identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained and discuss why this parameter is appropriate for demonstrating ongoing compliance, and

- identifies the specific monitoring procedures;
- b. set the operating parameter value, or range of values, that demonstrate compliance with 40 CFR 63.824 - 63.825; and
 - c. conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require and alternate monitoring scheme.
4. The permittee shall collect and record the following information each month for this emissions unit:
- a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The name and identification of each cleanup material employed.
 - e. The number of gallons of each cleanup material evaporated.
 - f. The VOC content of each cleanup material, in pounds per gallon.
 - g. The total uncontrolled VOC emissions from all coatings employed, in pounds or tons.
 - h. The total uncontrolled VOC emissions from all cleanup materials employed, in pounds or tons.
 - i. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
5. The permittee shall maintain records documenting the overall organic HAP efficiency as required in 40 CFR 63.825(d).

IV. Reporting Requirements

1. Within 30 days after start of construction, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to 40 CFR 63 Subpart KK. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - a. The name and mailing address of the permittee;
 - b. The physical location of the source if it is different from the mailing address;

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- c. Identification of the relevant MACT standard and the permittee's compliance date;
 - d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
 - f. The date of the start of construction.
2. Within 60 days following completion of the required compliance determination activity specified in the 40 CFR 63 Subpart KK, the permittee shall submit a notification of compliance status that contains the following information:
- a. The methods used to determine compliance;
 - b. The results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. The methods that will be used for determining compliance, including a description of the monitoring and reporting requirements and test methods;
 - d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart KK;
 - e. An analysis demonstrating whether the affected source is a major source or an area source;
 - f. A description of the air pollution control equipment or method of each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - g. A statement as to whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart KK.
3. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust

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gases immediately before the catalyst bed were less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.

The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.

4. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inch of water, as a three-hour average.

The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.

V. Testing Requirements

1. Control Requirements and Emissions Limitation

95% overall control efficiency for VOC emissions
 95% overall control efficiency for HAPs emissions
 2.15 lbs/hr VOC emissions

The permittee shall conduct an initial performance test within 180 days after startup of this emissions unit to establish the destruction efficiency of the catalytic oxidizer and the associated catalyst bed inlet temperature for the catalytic oxidizer and to determine compliance with the VOC mass emissions limitation in accordance with the following reference methods and procedures:

- a. Method 1 or 1A of 40 CFR part 60, Appendix A for sample and velocity traverses to determine sampling locations;
- b. Method 2, 2A, 2C, or 2D of 40 CFR part 60, Appendix A to determine gas volumetric flow rate;
- c. Method 3 of 40 CFR part 60, Appendix A for gas analysis to determine dry molecular weight;
- d. Method 4 of 40 CFR part 60, Appendix A to determine stack gas moisture;
- e. Method 25 of 40 CFR part 60, Appendix A to determine organic volatile matter concentration, except as provided in 40 CFR 63.827(d)(1)(vi)(A) - (C). The owner or operator shall submit notice of the intended test method to the Administrator for approval along with notice of the performance test required under 40 CFR 63.7(c). The owner or operator may use Method 25A of 40 CFR 60, Appendix A if:
 - i. an exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required;

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- ii. the organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or
- iii. because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

The permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For a catalytic oxidizer, the permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. This minimum temperature is the operating parameter value that demonstrates compliance continuing compliance with the control requirement in section A.I.1.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

2. Control Requirement

100% emissions capture

The permittee shall conduct a performance test within 180 days after startup of this emissions unit to determine the capture efficiency of each capture system venting organic emissions to a control device. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.

The capture efficiency shall be determined using Methods 204 through 204F as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

As an alternative to the above procedure, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in Appendix A of this subpart. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Emissions Limitation

9.43 TPY VOC emissions from coatings
3.89 TPY VOC emissions from cleanup materials.

Compliance with the annual VOC emissions limitation pursuant to OAC rule 3745-31-05(A)(3)

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shall be demonstrated by the summation of the following equations:

actual ink usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from inks;

actual thinner usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from thinners;

actual coating usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from coatings; and

actual cleanup material usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from cleanup materials.

VI. Miscellaneous Requirements

1. The permittee shall develop and implement a startup, shutdown and malfunction plan as required in 40 CFR Part 63.6(e)(3).
2. The start up of emissions unit K010 and K011, OEPA premise number 1483040077 shall be concurrent with the complete and permanent shutdown of Ohio EPA emissions units K001, K006 and K007, OEPA premise number 1483040077.

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B. State Only Enforceable Section

I. 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>
K010 - 2-station extruder/laminator with permanent total enclosure and catalytic oxidizer	None	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
K011 - 11-station rotogravure printing press and in-line laminator with permanent total enclosure and catalytic oxidizer	OAC rule 3745-31-05(A)(3)	40 CFR Part 63 Subpart KK
	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Prevention of Significant Deterioration	
	OAC rule 3745-31-05(D) Netting to Avoid Prevention of Significant Deterioration	
	OAC rule 3745-21-09(Y)(1)(b)	

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Applicable Emissions
Limitations/Control
Measures

28.2 lbs/hour VOC
emissions

The permittee shall operate an emissions capture system at a minimum capture efficiency of 100% and a control device (catalytic oxidizer) at a minimum overall control efficiency of 95% for VOC emissions.

The requirements of this rule also include compliance the requirements of 40 CFR 63 Subpart KK and OAC rule 3745-31-05(D).

45.0 TPY VOC emissions, based on a rolling, 12-month summation.

See term A.II.3

See term A.VI.2.

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

The permittee shall operate a capture system and control device (catalytic oxidizer) at a minimum overall control efficiency of 95% for Hazardous Air Pollutants (HAPs).

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2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control efficiency for VOC emissions, operation of an emissions capture and control system capable of 95% overall control efficiency for HAPs emissions, and compliance with usage and emissions limitations.
- 2.b** The hourly VOC emissions limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c** Any excursion(s) from the required operating parameters which are monitored in accordance with sections A.III.1. and A.III.2, unless otherwise excused, shall be considered a violation(s) of the control measures pursuant to OAC rule 3745-31-05(A)(3) outlined in section A.1.

II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a three-hour average, whenever the emissions unit is in operation.
3. The maximum annual usage rates for this emissions unit shall not exceed 110,000 gallons of ink, 110,000 gallons of thinner, 54,000 gallons of coating, and 10,800 gallons of cleanup material, based upon rolling, 12-month summations of the usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage levels (in gallons) specified in the following table:

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<u>Month(s)</u>	<u>Maximum Ink Usage</u>	<u>Maximum Thinner Usage</u>	<u>Maximum Coating Usage</u>	<u>Maximum Cleanup Usage</u>
1	9167	9167	4500	900
1-2	18333	18333	9000	1800
1-3	27500	27500	13500	2700
1-4	36667	36667	18000	3600
1-5	45833	45833	22500	4500
1-6	55000	55000	27000	5400
1-7	64167	64167	31500	6300
1-8	73333	73333	36000	7200
1-9	82500	82500	40500	8100
1-10	91667	91667	45000	9000
1-11	100833	100833	49500	9900
1-12	110000	110000	54000	10800

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limitations shall be based upon rolling, 12-month summations of the usage figures.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee operating each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance through performance tests of control device efficiency and continuing compliance through continuous monitoring of control device operating parameters, shall install, calibrate, operate and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius or +/- 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

The permittee shall collect and record the following information each day;

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring

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equipment, when the associated emissions unit was in operation.

All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder data logger, or temperature indicator shall be replaced. The replacement shall be done either if the owner or operate chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

2. The permittee shall install, maintain and operate monitoring device(s) and a recorder which simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all three-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a three-hour average.

3. The owner or operator of each oxidizer used to control emissions from one or more product and packaging rotogravure or wide-web flexographic presses choosing to demonstrate compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:
 - a. submit to the Administrator with the compliance status report required by 40 CFR 63.9(h) of the General Provisions, a plan that identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained and discuss why this parameter is appropriate for demonstrating ongoing compliance, and identifies the specific monitoring procedures;
 - b. set the operating parameter value, or range of values, that demonstrate compliance with 40 CFR 63.824 - 63.825; and
 - c. conduct monitoring in accordance with the plan submitted to the Administrator unless comments received from the Administrator require and alternate monitoring scheme.
4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the company identification for each ink, thinner, coating and cleanup material employed;
 - b. the number of gallons of each ink, thinner, coating, and cleanup material employed, as applied;
 - c. the volatile organic compound content of each ink, thinner, coating, and cleanup material, in pounds per gallon, as applied;

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- d. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the ink, thinner, coating, and cleanup material usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative usages of inks, thinners, coatings, and cleanup materials for each calendar month.

- e. The total uncontrolled VOC emissions from all inks, thinners, coatings and cleanup materials employed, in pounds or tons.
 - f. The updated rolling, 12-month summation controlled VOC emission rate for all inks, thinners, coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
5. The permittee shall maintain records documenting the overall organic HAP efficiency as required in 40 CFR 63.825(d).

IV. Reporting Requirements

1. Within 30 days after start of construction, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to 40 CFR 63 Subpart KK. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - a. The name and mailing address of the permittee;
 - b. The physical location of the source if it is different from the mailing address;
 - c. Identification of the relevant MACT standard and the permittee's compliance date;
 - d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
 - f. The date of the start of construction.

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2. Within 60 days following completion of the required compliance determination activity specified in the 40 CFR 63 Subpart KK, the permittee shall submit a notification of compliance status that contains the following information:
 - a. The methods used to determine compliance;
 - b. The results of any performance tests, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. The methods that will be used for determining compliance, including a description of the monitoring and reporting requirements and test methods;
 - d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart KK;
 - e. An analysis demonstrating whether the affected source is a major source or an area source;
 - f. A description of the air pollution control equipment or method of each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - g. A statement as to whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart KK.

3. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed were less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.

The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.

4. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inch of water, as a three-hour average.

The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations outlined in section A.II.3. of these Terms and Conditions and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of

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the maximum allowable cumulative usage levels outlined in section A.II.3. of these Terms and Conditions. These reports are due by the date described in General Term and Condition A.1.c.ii.

6. The permittee shall submit quarterly reports which include the updated rolling, 12- month total VOC emissions in tons per year for each month. These reports are due by the date described in General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Control Requirements and Emissions Limitation

95% overall control efficiency for VOC emissions
95% overall control efficiency for HAPs emissions
28.2 lbs/hr VOC emissions

The permittee shall conduct an initial performance test within 180 days after issuance of this permit to establish the destruction efficiency of the catalytic oxidizer and the associated catalyst bed inlet temperature for the catalytic oxidizer and to determine compliance with the VOC mass emissions limitation in accordance with the following reference methods and procedures:

- a. Method 1 or 1A of 40 CFR part 60, Appendix A for sample and velocity traverses to determine sampling locations;
- b. Method 2, 2A, 2C, or 2D of 40 CFR part 60, Appendix A to determine gas volumetric flow rate;
- c. Method 3 of 40 CFR part 60, Appendix A for gas analysis to determine dry molecular weight;
- d. Method 4 of 40 CFR part 60, Appendix A to determine stack gas moisture;
- e. Method 25 of 40 CFR part 60, Appendix A to determine organic volatile matter concentration, except as provided in 40 CFR 63.827(d)(1)(vi)(A) - (C). The owner or operator shall submit notice of the intended test method to the Administrator for approval along with notice of the performance test required under 40 CFR 63.7(c). The owner or operator may use Method 25A of 40 CFR 60, Appendix A if:
 - i. an exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required;
 - ii. the organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or
 - iii. because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

The permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For a catalytic oxidizer, the permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. This minimum temperature is the operating parameter value that demonstrates compliance continuing compliance with the control requirement in section A.I.1.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

2. Control Requirement

100% emissions capture

The permittee shall conduct a performance test within 180 days after issuance of this permit to determine the capture efficiency of each capture system venting organic emissions to a control device. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.

The capture efficiency shall be determined using Methods 204 through 204F as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable

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requirement.)

As an alternative to the above procedure, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in Appendix A of this subpart. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Emissions Limitation

45.0 TPY VOC

Compliance with the annual VOC emissions limitation pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the summation of the following equations:

actual ink usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from inks;

actual thinner usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from thinners;

actual coating usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from coatings; and

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actual cleanup material usage (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from cleanup materials.

4. Compliance with the usage limitations in term A.II.3 shall be demonstrated by the record keeping in term A.III.4.

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VI. Miscellaneous Requirements

1. The permittee shall develop and implement a startup, shutdown and malfunction plan as required in 40 CFR Part 63.6(e)(3).
2. The following is a summary of the netting emissions in tons per year (TPY):

<u>Emissions Unit</u>	<u>Pollutant</u>	<u>Decrease</u>	<u>Increase</u>
K001	VOC	-6.0*	
K006	VOC	-11.2*	
K007	VOC	-2.75*	
K010	VOC		+13.32
K011	VOC		+45.0
Net Emissions Change	VOC		+38.37

* Based on average actual emissions for 1997 and 1998.

3. The start up of emissions unit K010 and K011, OEPA premise number 1483040077 shall be concurrent with the complete and permanent shutdown of Ohio EPA emissions units K001, K006 and K007, OEPA premise number 1483040077.

B. State Only Enforceable Section

I. 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>
K011 - 11-station rotogravure printing press and in-line laminator with permanent total enclosure and catalytic oxidizer	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Sonoco

PTI A

Emissions Unit ID: L001

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>
L001 - PRI cold solvent parts washer with catalytic oxidizer	OAC rule 3745-31-05(A)(3)	2.7 lbs/day VOC emissions 0.50 TPY VOC emissions The permittee shall operate an emissions capture system at a minimum capture efficiency of 100% and a control device (catalytic oxidizer) at a minimum overall control efficiency of 95% for VOC emissions. The requirements of this rule also include compliance the requirements of OAC rule 3745-21-09(O)(2).
	OAC rule 3745-21-09(O)(2)	See term A.II.1.

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control of VOC emissions and compliance with the daily and annual VOC emissions limitations.
- 2.b** The hourly emissions limitations outlined in A.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly or daily records are required to demonstrate compliance with these limits.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. The permittee shall maintain this emissions unit in accordance with the following work practices:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvents in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. Supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed ten pounds per square inch gauge.
 - f. Clean only materials that are neither porous nor absorbent.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee operating each oxidizer choosing to demonstrate compliance through performance tests of control device efficiency and continuing compliance through continuous monitoring of control device operating parameters, shall install, calibrate, operate and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius or +/- 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

The permittee shall collect and record the following information each day;

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder data logger, or

Emissions Unit ID: L001

temperature indicator shall be replaced. The replacement shall be done either if the owner or operate chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

2. The permittee shall install, maintain and operate monitoring device(s) and a recorder which simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all three-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a three-hour average.

3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed (gallons employed minus gallons disposed of as solvent waste); and
 - d. The calculated, controlled VOC emission rate for cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed where less than the average temperature during the most recent stack test which demonstrated the emissions unit to be in compliance.

The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.

2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inch of water, as a three-hour average.

The permittee shall submit the reports to the Hamilton County Department of Environmental Services according to the reporting schedule outlined in General Term and Condition A.1.c.ii.

V. Testing Requirements

Issued: To be entered upon final issuance

1. Control Requirements and Emissions Limitation

95% overall control efficiency for VOC emissions
2.7 lbs/day VOC emissions

The permittee shall conduct an initial performance test within 180 days after issuance of this permit to establish the destruction efficiency of the catalytic oxidizer and the associated catalyst bed inlet temperature for the catalytic oxidizer and to determine compliance with the VOC mass emissions limitation in accordance with the following reference methods and procedures:

- a. Method 1 or 1A of 40 CFR part 60, Appendix A for sample and velocity traverses to determine sampling locations;
- b. Method 2, 2A, 2C, or 2D of 40 CFR part 60, Appendix A to determine gas volumetric flow rate;
- c. Method 3 of 40 CFR part 60, Appendix A for gas analysis to determine dry molecular weight;
- d. Method 4 of 40 CFR part 60, Appendix A to determine stack gas moisture;
- e. Method 25 of 40 CFR part 60, Appendix A to determine organic volatile matter concentration, except as provided in 40 CFR 63.827(d)(1)(vi)(A) - (C). The owner or operator shall submit notice of the intended test method to the Administrator for approval along with notice of the performance test required under 40 CFR 63.7(c). The owner or operator may use Method 25A of 40 CFR 60, Appendix A if:
 - i. an exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required;
 - ii. the organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or
 - iii. because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

The permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and

Emissions Unit ID: L001

malfunction shall not constitute representative conditions for the purpose of a performance test.

For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For a catalytic oxidizer, the permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. This minimum temperature is the operating parameter value that demonstrates compliance continuing compliance with the control requirement in section A.I.1.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

2. Control Requirement

100% emissions capture

The permittee shall conduct a performance test within 180 days after issuance of this permit to determine the capture efficiency of each capture system venting organic emissions to a control device. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.

The capture efficiency shall be determined using Methods 204 through 204F as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

As an alternative to the above procedure, the permittee may use any capture efficiency protocol

Emissions Unit ID: L001

and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in Appendix A of this subpart. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Emissions Limitation

0.50 TPY VOC

Compliance with the annual VOC emissions limitation pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the summation of the following equation:

actual cleanup material usage* (gal/yr) x actual VOC content (lbs/gal) x overall control efficiency [from the most recent stack test which demonstrated the emissions unit to be in compliance (1 - % control efficiency/100)] x ton/2000 lbs = TPY VOC from cleanup materials.

*that portion of the total cleanup material which was lost to evaporation (gallons employed - gallons disposed of as solvent waste)

VI. Miscellaneous Requirements

None

Sonoco

PTI A

Emissions Unit ID: L001

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. 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>
L001 - PRI cold solvent parts washer with catalytic oxidizer	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 14-05095 Facility ID: 1483040077

FACILITY NAME Sonoco Flexible Packaging, Inc.

FACILITY DESCRIPTION Chapter 31 Modification to K005, K008, CITY/TWP Franklin
and L001; installation of new emissions
units K010 and K011.

SIC CODE 2754 SCC CODE 4-05-005-12 EMISSIONS UNIT ID K005

EMISSIONS UNIT DESCRIPTION Rotomec No.3 8-station rotogravure printing press with permanent total enclosure and
catalytic oxidizer

DATE INSTALLED Upon PTI 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 ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	28.2 lbs./hour	94.7	28.2 lbs./hour	94.7
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR 63 PSD? OFFSET POLICY?
Subpart KK

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

Enter Determination Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control of VOC emissions, operation of an emissions capture and control system capable of 95% overall control of HAPs emissions, and compliance with hourly and annual VOC emissions limitations.

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: 14-05095 Facility ID: 1483040077

FACILITY NAME Sonoco Flexible Packaging, Inc.

FACILITY DESCRIPTION Chapter 31 Modification to K005. K008. CITY/TWP Franklin

Emissions Unit ID: L001

SIC CODE 2754 SCC CODE 4-05-005-12 EMISSIONS UNIT ID K008

EMISSIONS UNIT DESCRIPTION Black Clawson 2-station extruder/laminator with permanent total enclosure and catalytic oxidizer

DATE INSTALLED Upon permit 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 ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	2.15 lbs/hour	13.32	2.15 lbs/hour	13.32
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR 63 PSD? OFFSET POLICY?

Subpart KK

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

Enter Determination Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control of VOC emissions, operation of an emissions capture and control system capable of 95% overall control of HAPs emissions, and compliance with hourly and annual VOC emissions limitations.

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 contaminants 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: 14-05095 Facility ID: 1483040077

FACILITY NAME Sonoco Flexible Packaging, Inc.

FACILITY DESCRIPTION Chapter 31 Modification to K005. K008. CITY/TWP Franklin

Emissions Unit ID: L001

SIC CODE 2754 SCC CODE 4-05-005-12 EMISSIONS UNIT ID K010

EMISSIONS UNIT DESCRIPTION 2-station extruder/laminator with permanent total enclosure and catalytic oxidizer

DATE INSTALLED Upon Permit 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 ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	2.15 lbs/hour	13.32	2.15 lbs/hour	13.32
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR 63 PSD? OFFSET POLICY?
 Subpart KK

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

Enter Determination Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control of VOC emissions, operation of an emissions capture and control system capable of 95% overall control of HAPs emissions, and compliance with hourly and annual VOC emissions limitations.

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 contaminants 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: 14-05095 Facility ID: 1483040077

FACILITY NAME Sonoco Flexible Packaging, Inc.

FACILITY DESCRIPTION Chapter 31 Modification to K005. K008. CITY/TWP Franklin

Emissions Unit ID: L001

SIC CODE 2754 SCC CODE 4-05-005-12 EMISSIONS UNIT ID K011

EMISSIONS UNIT DESCRIPTION 11-station rotogravure printing press and in-line laminator with permanent total enclosure and catalytic oxidizer

DATE INSTALLED Upon Issuance of Permit

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 ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	28.2 lbs./hour	45.0	28.2 lbs./hour	45.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR 63 PSD? OFFSET POLICY?

Subpart KK

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

Enter Determination Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control of VOC emissions, operation of an emissions capture and control system capable of 95% overall control of HAPs emissions, and compliance with usage and emissions limitations.

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 contaminants 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:

7 NEW SOURCE REVIEW FORM B

PTI Number: 14-05095 Facility ID: 1483040077

FACILITY NAME Sonoco Flexible Packaging, Inc.

FACILITY DESCRIPTION Chapter 31 Modification to K005. K008. CITY/TWP Franklin

Emissions Unit ID: L001

SIC CODE 2754 SCC CODE 4-05-003-06 EMISSIONS UNIT ID L001

EMISSIONS UNIT DESCRIPTION PRI cold solvent parts washer with catalytic oxidizer

DATE INSTALLED Upon Permit 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 ₁₀					
Sulfur Dioxide					
Organic Compounds	Attainment	2.7 lbs/day	0.5	2.7 lbs/day	0.5
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?

Enter Determination Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the operation of an emissions capture and control system capable of 100% capture of VOC emissions (total enclosure) and 95% overall control of VOC emissions and compliance with the daily and annual VOC emissions limitations.

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 contaminants 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: