



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
WARREN COUNTY**

CERTIFIED MAIL

Street Address:

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

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Lazarus Gov.
Center

Application No: 14-03773

DATE: 6/27/2002

Sonoco Flexible Packaging, Inc.
Jeff Cheak
708 South Avenue
Franklin, OH 45005-3654

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

Very truly yours,

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

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 6/27/2002
Effective Date: 6/27/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-03773

Application Number: 14-03773
APS Premise Number: 1483040077
Permit Fee: **\$100**
Name of Facility: Sonoco Flexible Packaging, Inc.
Person to Contact: Jeff Cheak
Address: 708 South Avenue
Franklin, OH 45005-3654

Location of proposed air contaminant source(s) [emissions unit(s)]:
**708 South Avenue
Franklin, Ohio**

Description of proposed emissions unit(s):
Modification to PTI 14-03773; administrative change to annual throughput limits with no increase in allowable VOC emissions.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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.

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 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 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.

12. 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.

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. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. 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.

6. 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.

7. 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).

8. 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.

9. 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	39.45

Sonoco Flexible Packaging, Inc.

PTI Application: **14-03773**

Modification Issued: 6/27/2002

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Sonoco

PTI A1

Modification Issued: 6/27/2002

Emissions Unit ID: K009

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

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>
K009 - Rotomec 56 inch 10-station rotogravure printing press and dryers with PTE and catalytic oxidizer	OAC rule 3745-31-05(A)(3)	29.3 lbs/hour VOC emissions, excluding 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.
	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Non-Attainment Area review and Emissions Offsets	39.45 TPY VOC emissions, based on a rolling, 12-month summation., including clean-up materials
	OAC rule 3745-21-09(Y)(1)(b)	See term A.II.3 The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	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).

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Sonoco

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Emissions Unit ID: K009

Modification Issued: 6/27/2002**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 more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance,. The average temperature difference across the catalyst bed at maximum operating capacity, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission 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 263,000 gallons of ink, 263,000 gallons of thinner, 526,000 gallons of coating, 10,950 gallons of cleanup material, 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

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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.

Emissions Unit ID: K009

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 operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. 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 more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
3. 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.

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Emissions Unit ID: K009

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.

4. 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.
5. 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;
 - d. The updated rolling, 12-month summations of the ink, thinner, coating, and cleanup material usage figures;
 - e. The total uncontrolled VOC emissions from all inks, thinners, coatings and cleanup materials employed, in pounds or tons; and
 - 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.
6. The permittee shall maintain records documenting the overall organic HAP efficiency as required in 40 CFR 63.825(d).

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Sonoco Flexible Packaging, Inc.

PTI Application: 14-02772

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Facility ID: 1483040077

Emissions Unit ID: K009

IV. Reporting Requirements

1. 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.
2. 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.
3. 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.

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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 deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations 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.
5. 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.
6. The permittee shall submit quarterly summaries of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. 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 more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. All 3-hour blocks of time (when the emissions unit was in operation at maximum operating capacity) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 30, October 30, and January 30, and shall cover the records for the previous calendar quarters.

V. Testing Requirements

1. Control Requirements and Emissions Limitation

95% overall control efficiency for VOC emissions
95% overall control efficiency for HAPs emissions
29.3 lbs/hr VOC emissions, excluding cleanup materials

Emissions testing for this emissions unit shall be conducted 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.

2. Control Requirement

100% emissions capture

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

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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.

3. Emissions Limitation

39.45 TPY VOC, based on a rolling, 12-month summation

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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 on a rolling 12-month basis:

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.

4. Compliance with the usage limitations in term A.II.3 shall be demonstrated by the record keeping in term A.III.5.
5. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

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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>
K009 - Rotomec 56 inch 10-station rotogravure printing press and dryers with PTE and catalytic oxidizer		LIMIT(s)

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