



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 16-02024

DATE: 3/29/00

JPS Packaging
Fred Cleary
1972 Akron-Peninsula Rd
Akron, OH 44313

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 **\$200** 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
WV

ARAQMD
PA

Akron Metro Area Trans Study



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 16-02024

Application Number: 16-02024
APS Premise Number: 1677000105
Permit Fee: **To be entered upon final issuance**
Name of Facility: JPS Packaging
Person to Contact: Fred Cleary
Address: 1972 Akron-Peninsula Rd
Akron, OH 44313

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

**1972 Akron-Peninsula Rd
Akron, Ohio**

Description of proposed emissions unit(s):

Addition of flexographic printing station to existing emissions unit K016.

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

JPS Packaging

Facility ID: 1677000105

PTI Application: 16-02024

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.11 below if no deviations occurred during the quarter.

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- 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

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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

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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.

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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.

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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

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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.

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 are inadequate or cannot meet applicable standards.

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

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).

9. Best Available Technology

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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.

10. 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.

11. 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	249.9
Single HAP	9.9
Combined HAP	24.9

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. JPS Packaging, d.b.a. Sealright, has requested to restrict the emissions of any individual Hazardous Air Pollutant (HAP) to 9.9 tons per rolling, 12-month period, the emissions of total combined HAPs to 24.9 tons per rolling, 12-month period, and the emissions of volatile organic compound (VOC) to 249.9 tons per rolling, 12-month period. The company proposed these emission limits to avoid PSD permitting and the Printing and Publishing MACT, 40 CFR Part 63, subpart KK. JPS Packaging, d.b.a. Sealright, has accepted these emission limits as a facility-wide caps on emissions from units K003, K005, K006, K008, K010, K012, K013, K014, K015, K016, K017, K018, K019, T001, T002, and T003.
2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s) HAPs	Maximum Allowable Cumulative Emissions of VOC	Maximum Allowable Cumulative Emissions of Each Individual HAP	Maximum Allowable Cumulative Emissions of Total Combined
1	20.8 tons	1.0 ton	2.0 tons
1-2	41.7 tons	2.0 tons	4.0 tons
1-3	62.5 tons	3.0 tons	6.0 tons
1-4	83.3 tons	4.0 tons	8.0 tons
1-5	104.1 tons	5.0 tons	10.0 tons
1-6	125.0 tons	6.0 tons	12.0 tons
1-7	144.8 tons	6.7 tons	14.2 tons
1-8	166.6 tons	7.3 tons	16.3 tons
1-9	187.4 tons	8.0 tons	18.5 tons
1-10	208.3 tons	8.6 tons	20.6 tons
1-11	229.1 tons	9.3 tons	22.8 tons
1-12	249.9 tons	9.9 tons	24.9 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for VOC, individual HAP, and total combined HAPs shall be based upon a rolling, 12-month summation of the monthly emissions.

3. In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for emissions units K003, K005, K006, K008, K010, K012, K013, K014, K015, K016, K017, K018, K019, T001, T002, and T003:
 - a. For emissions units without control equipment (K012, K017, K018, and K019):
 - i. the name and identification of each coating;
 - ii. the VOC content of each coating, in weight percent;

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- iii. the individual HAP content for each HAP of each coating, in weight percent;
- iv. the total combined HAPs content of each coating, in weight percent (sum all the individual HAP contents from section 3.a.iii);
- v. the total pounds of each coating employed;
- vi. the name and identification of each solvent* employed;
- vii. the VOC content of each solvent, in weight percent;
- viii. the individual HAP content for each HAP of each solvent, in weight percent;
- ix. the total combined HAPs content of each solvent, in weight percent (sum all the individual HAP contents from section 3.a.viii);
- x. the total pounds of each solvent employed;
- xi. the total uncontrolled individual HAP emissions for each HAP for all coatings and solvents employed, in tons per month (for each HAP, the sum of section 3.a.iii divided by 100 times section 3.a.v for each coating plus the sum of section 3.a.viii divided by 100 times section 3.a.x for each solvent, divided by 2000);
- xii. the uncontrolled total combined HAPs emissions for all coatings and solvents employed, in tons per month (the sum of section 3.a.iv divided by 100 times section 3.a.v for each coating plus the sum of section 3.a.ix divided by 100 times section 3.a.x for each solvent, divided by 2000); and
- xiii. the total uncontrolled VOC emissions for all coatings and solvents employed, in tons per month (the sum of section 3.a.ii divided by 100 times section 3.a.v for each coating plus the sum of section 3.a.vii divided by 100 times section 3.a.x for each solvent, divided by 2000).

*Solvent is defined as cleanup material and coating thinning material.

- b. For emissions units with control equipment (K003, K005, K006, K008, K010, K013, K014, K015, and K016):

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- i. the name and identification of each coating;
- ii. the VOC content of each coating in weight percent;
- iii. the individual HAP content for each HAP of each coating, in weight percent;
- iv. the total combined HAPs content of each coating, in weight percent (sum all the individual HAP contents from section 3.b.iii);
- v. the total pounds of each coating employed;
- vi. the name and identification of each solvent* employed;
- vii. the VOC content of each solvent, in weight percent;
- viii. the individual HAP content for each HAP of each solvent, in weight percent;
- ix. the total combined HAPs content of each solvent, in weight percent (sum all the individual HAP contents from section 3.b.viii);
- x. the total pounds of each solvent employed;
- xi. the total uncontrolled individual HAP emissions for each HAP for all the coatings and solvents employed, in tons per month (for each HAP, the sum of section 3.b.iii divided by 100 times section 3.b.v for each coating plus the sum of section 3.b.viii divided by 100 times section 3.b.x for each solvent, divided by 2000);
- xii. the uncontrolled total combined HAPs emissions for all the coatings and solvents employed, in tons per month (the sum of section 3.b.iv divided by 100 times section 3.b.v for each coating plus the sum of section 3.b.ix divided by 100 times section 3.b.x for each solvent, divided by 2000);
- xiii. the total uncontrolled VOC accounted for in all coatings and solvents employed, in tons per month (the sum of section 3.b.ii

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divided by 100 times section 3.b.v for each coating plus the sum of section 3.b.vii divided by 100 times section 3.b.x for each solvent, divided by 2000);

- xiv. the total number of coating waste drums;
- xv. the total amount of VOC accounted for in the coating waste drums, in tons per month;
- xvi. the total uncontrolled VOC emissions, in tons per month (section 3.b.xiii minus section 3.b.xv);
- xvii. the linear feet of material produced by each emissions unit;
- xviii. the total linear feet of material produced by all of emissions units that employ control equipment;
- xix. the total uncontrolled individual HAP emissions for each HAP for each emissions unit, in tons per month (for each emissions unit section 3.b.xvii divided by section 3.b.xviii and then multiplied by section 3.b.xi);
- xx. the uncontrolled total combined HAPs emissions for each emissions unit, in tons per month (for each emissions unit section 3.b.xvii divided by section 3.b.xviii and then multiplied by section 3.b.xii);
- xxi. the total VOC emissions for each emissions unit, in tons per month (for each emissions unit section 3.b.xvii divided by section 3.b.xviii and then multiplied by section 3.b.xvi);
- xxii. for each emissions unit, the calculated, controlled individual HAP emission rate for all coatings and solvents, in pounds or tons (the controlled 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

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compliance);

- xxiii. for each emissions unit, the calculated, controlled total combined HAPs emission rate for all coatings and solvents, in pounds or tons (the controlled 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);
- xxiv. for each emissions unit, the calculated, controlled VOC emission rate for all coatings and solvents, in pounds or tons (the controlled 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);
- xxv. the total calculated, controlled individual HAP emission rate for all the emissions units (sum all the calculated, controlled individual HAP emission rate for each emissions unit from section 3.b.xxii);
- xxvi. the total calculated, controlled total combined HAPs emission rate for all the emissions units (sum all the calculated, controlled total combined HAPs emission rate for each emissions unit from section 3.b.xxiii); and
- xxvii. the total calculated, controlled VOC emission rate for all the emissions units (sum all the calculated, controlled VOC emission rate for each emissions unit from section 3.b.xxiv).

*Solvent is defined as cleanup material and coating thinning material.

c.For total facility emissions:

- i. the total individual HAP emissions for the entire facility, in tons per month (section 3.a.xi plus section 3.b.xxv);
- ii. the total combined HAPs emissions for the entire facility, in tons per month (section 3.a.xii plus section 3.b.xxvi);
- iii. the total VOC emissions for the entire facility, in tons per month (section 3.a.xiii

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plus section 3.b.xxvii plus 3.0 tons per year*);

- iv. during the first 12 calendar months of operations following the issuance of this permit, the permittee shall record the cumulative emissions of each individual HAP, total combined HAPs, and VOC for the entire facility for each calendar month;
- v. beginning after the first 12 calendar months of operations following the issuance of this permit, the permittee shall record the rolling, 12-month summation of the monthly emissions of each individual HAP, total combined HAPs, and VOC for the entire facility for each calendar month.

* The potential to emit for VOC for the three storage tanks is 3.0 tons per year. The storage tanks do not store any HAP.

- 4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP, and total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition (A)(1)(c).
- 5. The permittee shall submit annual reports that specify the following information:
 - a. for the entire facility, the rolling, 12-month summations of monthly emissions of VOC, individual HAP, and total combined HAPs for each month during the calendar year (January through December);
 - b. for the entire facility, the cumulative emissions of VOC, individual HAP, and total combined HAPs for each month for the first 12 calendar months of operation following the issuance of this permit; and
 - c. for each emissions unit, the VOC emission rate, in tons per year.

The annual reports shall be submitted by January 31 of each year, and shall cover the records for the previous calendar year (January through December).

- 6. Compliance with the emission limitations in section A.2 of these terms and conditions shall be

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determined in accordance with the following methods:

Emission Limitation:

9.9 tons of HAP per rolling, 12-month period
24.9 tons of HAPs per rolling, 12-month period
249.9 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

In accordance with sections A.3, A.3.a, A.3.b, and A.3.c of these terms and conditions, the permittee shall maintain monthly records of the VOC content, individual HAP content, and total combined HAPs content, in weight percent, as applied, of each coating and solvent and the total pounds of each coating and solvent employed. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings and inks. Formulation data shall be used to determine the HAP contents of the coatings and solvents.

7. This Permit to Install shall supersede all the air pollution control requirements for this emissions unit previously contained in Permit to Install 16-958, as issued originally on June 9, 1993 and administratively modified on xxxx, x 2000.

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

None

JPS P:

PTI A

Emissions Unit ID: K008

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>
6-color flexographic printing press with outboard rotogravure coater - W & H 2 controlled with catalytic incinerator #2	OAC rule 3745-31-05	49.0 lbs/hr of volatile organic compounds (VOC)
		25.0 tpy of VOC
		See A.I.2.a below.
	OAC rule 3745-21-09(Y)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least ninety percent, by weight, and an overall control efficiency which is at least seventy percent, by weight, for VOC.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05.

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 650 degrees Fahrenheit.

JPS P:

PTI A

Emissions Unit ID: K008

Issued: To be entered upon final issuance

The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit.

JPS P:

PTI A

Emissions Unit ID: K008

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. 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.
2. The permittee shall collect and record the following information for each day for the control equipment:
 - 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 650 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit; and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation;
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.3.a).

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 does not comply with the temperature limitation specified above.

The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was operating at maximum conditions during which the average

Emissions Unit ID: K008

temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 49.0 lbs/hr, and the actual average hourly VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to the renewal of the Title V permit to operate.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the overall control efficiency limitations for VOC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. 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.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

JPS Packaging**PTI Application: 16-03024****Issued****Facility ID: 1677000105**

Emissions Unit ID: K008

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
4. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
5. Compliance with the emission limitations and control efficiencies in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

a control efficiency which is at least ninety per cent, by weight, and an overall control efficiency which is at least seventy per cent, by weight

Applicable Compliance Method:

Compliance with the allowable capture efficiency for VOC shall be determined using Method 204 through 204F in 40 CFR Part 51, Appendix M or using an alternative method or procedure in accordance with USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. Compliance with the allowable control efficiency for VOC shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. Compliance with the allowable capture and control efficiencies for VOC shall also be determined through the monitoring and record keeping requirements in section A.III of these terms and conditions.

b. Emission Limitation:

49.0 lbs/hr of VOC

Applicable Compliance Method:

JPS P:

PTI A

Emissions Unit ID: K008

Issued: To be entered upon final issuance

Monthly record keeping as required in sections A.3.b of Part II - Specific Facility Terms and Conditions and A.III.3 of the Terms and Conditions for this emissions unit.

c. Emission Limitation:

25.0 tpy of VOC

JPS P:

PTI A

Emissions Unit ID: K008

Issued: To be entered upon final issuance

Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions section A.3.b of this permit, monthly record keeping of the coating and solvent usage and the VOC content, in weight percent, of each coating and solvent shall be maintained as a demonstration of compliance with this emissions limitation.

VI. Miscellaneous Requirements

None

JPS P:
PTI A

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>
6-color flexographic printing press with outboard rotogravure coater - W & H2 controlled with catalytic incinerator #2	OAC rule 3745-31-05	See B.III.1 and B.VI below.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K008) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 128.2

Issued: To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 11714.3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters

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used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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>
6-color flexographic printing press - W & H 4 controlled with thermal incinerator #2	OAC rule 3745-31-05	30.0 lbs/hr of volatile organic compounds (VOC)
		25.0 tpy of VOC
		See A.I.2.a below.
	OAC rule 3745-21-09(Y)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least ninety percent, by weight, and an overall control efficiency which is at least seventy percent, by weight, for VOC.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1300 degrees Fahrenheit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 monitor

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and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the control equipment:
 - a. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1300 degrees Fahrenheit.
3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation;
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.3.a).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 30.0 lbs/hr, and the actual average hourly VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to the renewal of the Title V permit to operate.

- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the overall control efficiency limitations for VOC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. 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.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
 4. 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may

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request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

5. Compliance with the emission limitations and control efficiencies in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

a control efficiency which is at least ninety per cent, by weight, and an overall control efficiency which is at least seventy per cent, by weight

Applicable Compliance Method:

Compliance with the allowable capture efficiency for VOC shall be determined using Method 204 through 204F in 40 CFR Part 51, Appendix M or using an alternative method or procedure in accordance with USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. Compliance with the allowable control efficiency for VOC shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. Compliance with the allowable capture and control efficiencies for VOC shall also be determined through the monitoring and record keeping requirements in section A.III of these terms and conditions.

- b. Emission Limitation:

30.0 lbs/hr of VOC

Applicable Compliance Method:

Monthly record keeping as required in sections A.3.b of Part II - Specific Facility Terms and Conditions and A.III.3 of the Terms and Conditions for this emissions unit.

- c. Emission Limitation:

25.0 tpy of VOC

Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions section A.3.b of this permit, monthly record keeping of the coating and solvent usage and the VOC content, in weight percent, of each coating and solvent shall be maintained as a demonstration of compliance with this emissions limitation.

JPS Packaging

PTI Application: 16-02024

Issued

Facility ID: 1677000105

Emissions Unit ID: K013

VI. Miscellaneous Requirements

None

JPS P:

PTI A

Emissions Unit ID: K013

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>
6-color flexographic printing press - W & H 4 controlled with thermal incinerator #2	OAC rule 3745-31-05	See B.III.1 and B.VI below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

35

JPS P:

PTI A

Issued: To be entered upon final issuance

None

Emissions Unit ID: K013

JPS P:

PTI A

Emissions Unit ID: K013

Issued: To be entered upon final issuance**V. Testing Requirements**

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K013) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 11714.3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound

JPS P:

PTI A

Emissions Unit ID: K013

Issued: To be entered upon final issuance

with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

JPS P:
PTI A

Emissions Unit ID: K014

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>
6-color flexographic printing press - PC 4 controlled with thermal incinerator #1	OAC rule 3745-31-05	46.0 lbs/hr of volatile organic compounds (VOC)
		25.0 tpy of VOC
		See A.I.2.a below.
	OAC rule 3745-21-09(Y)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least ninety percent, by weight, and an overall control efficiency which is at least seventy percent, by weight, for VOC.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1300 degrees Fahrenheit.

III. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: K014

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day for the control equipment:
 - a. a log of the downtime for the capture (collection) system, thermal incinerator, and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1300 degrees Fahrenheit.
3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation;
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.3.a).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 46.0 lbs/hr, and the actual average hourly VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to the renewal of the Title V permit to operate.

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- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the overall control efficiency limitations for VOC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. 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.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

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Emissions Unit ID: K014

4. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
5. Compliance with the emission limitations and control efficiencies in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

a control efficiency which is at least ninety per cent, by weight, and an overall control efficiency which is at least seventy per cent, by weight

Applicable Compliance Method:

Compliance with the allowable capture efficiency for VOC shall be determined using Method 204 through 204F in 40 CFR Part 51, Appendix M or using an alternative method or procedure in accordance with USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. Compliance with the allowable control efficiency for VOC shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. Compliance with the allowable capture and control efficiencies for VOC shall also be determined through the monitoring and record keeping requirements in section A.III of these terms and conditions.

- b. Emission Limitation:

46.0 lbs/hr of VOC

Applicable Compliance Method:

Monthly record keeping as required in sections A.3.b of Part II - Specific Facility Terms and Conditions and A.III.3 of the Terms and Conditions for this emissions unit.

- c. Emission Limitation:

25.0 tpy of VOC

Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions section A.3.b of this permit, monthly record keeping of the coating and solvent usage and the VOC content, in weight percent, of each coating and solvent shall be maintained as a demonstration of compliance with this emissions limitation.

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VI. Miscellaneous Requirements

None

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PTI A

Emissions Unit ID: K014

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>
6-color flexographic printing press - PC 4 controlled with thermal incinerator #1	OAC rule 3745-31-05	See B.III.1 and B.VI below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

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Facility ID: 1677000105

Emissions Unit ID: K014

None

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Emissions Unit ID: K014

Issued: To be entered upon final issuance**V. Testing Requirements**

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K014) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 128.2

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 11714.3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters

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used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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>
6-color flexographic printing press - W & H SOLO controlled with catalytic incinerator #2	OAC rule 3745-31-05	15.0 lbs/hr of volatile organic compounds (VOC)
		10.0 tpy of VOC
		See A.I.2.a below.
	OAC rule 3745-21-09(Y)	See A.I.2.b below.

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least ninety percent, by weight, and an overall control efficiency which is at least seventy percent, by weight, for VOC.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05.

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 650 degrees Fahrenheit.

The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit.

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III. Monitoring and/or Recordkeeping Requirements

1. 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.
2. The permittee shall collect and record the following information for each day for the control equipment:
 - 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 650 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit; and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation;
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.3.a).

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 does not comply with the temperature limitation specified above.

The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was operating at maximum conditions during which the average

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temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 15.0 lbs/hr, and the actual average hourly VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to the renewal of the Title V permit to operate.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the overall control efficiency limitations for VOC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. 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.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and

Emissions Unit ID: K015

procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
4. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
5. Compliance with the emission limitations and control efficiencies in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

a control efficiency which is at least ninety per cent, by weight, and an overall control efficiency which is at least seventy per cent, by weight

Applicable Compliance Method:

Compliance with the allowable capture efficiency for VOC shall be determined using Method 204 through 204F in 40 CFR Part 51, Appendix M or using an alternative method or procedure in accordance with USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. Compliance with the allowable control efficiency for VOC shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. Compliance with the allowable capture and control efficiencies for VOC shall also be determined through the monitoring and record keeping requirements in section A.III of these terms and conditions.

b. Emission Limitation:

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15.0 lbs/hr of VOC

Applicable Compliance Method:

Monthly record keeping as required in sections A.3.b of Part II - Specific Facility Terms and Conditions and A.III.3 of the Terms and Conditions for this emissions unit.

c. Emission Limitation:

10.0 tpy of VOC

JPS P:

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Emissions Unit ID: K015

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Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions section A.3.b of this permit, monthly record keeping of the coating and solvent usage and the VOC content, in weight percent, of each coating and solvent shall be maintained as a demonstration of compliance with this emissions limitation.

VI. Miscellaneous Requirements

None

JPS P:

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Emissions Unit ID: K015

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>
6-color flexographic printing press - W & H SOLO controlled with catalytic incinerator #2	OAC rule 3745-31-05	See B.III.1 and B.VI below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

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Emissions Unit ID: K015

None

JPS P:

PTI A

Emissions Unit ID: K015

Issued: To be entered upon final issuance**V. Testing Requirements**

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K015) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 11714.3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound

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with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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PTI A

Emissions Unit ID: K016

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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>
8-color flexographic printing press with outboard flexographic coater - PC VISION controlled with catalytic incinerator #2 *Modification (installation of outboard coater)	OAC rule 3745-31-05	30.0 lbs/hr of volatile organic compounds (VOC) 25.0 tpy of VOC See A.I.2.a below. See A.I.2.b below.
	OAC rule 3745-21-09(Y)	

2. Additional Terms and Conditions

- 2.a The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least ninety percent, by weight, and an overall control efficiency which is at least seventy percent, by weight, for VOC.
- 2.b The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05.

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 650 degrees Fahrenheit.

The average temperature difference across the catalyst bed, for any 3-hour block of time when the

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emissions unit is operating at maximum conditions, shall not be less than 80 degrees Fahrenheit.

JPS P:

PTI A

Emissions Unit ID: K016

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. 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.
2. The permittee shall collect and record the following information for each day for the control equipment:
 - 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 650 degrees Fahrenheit;
 - b. all 3-hour blocks of time (when the emissions unit was operating at maximum conditions) during which the average temperature difference across the catalyst bed was less than 80 degrees Fahrenheit; and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the total number of hours this emissions unit was in operation;
 - b. the average, controlled VOC emission rate for this emissions unit, in pounds per hour (A.3.b.xxiv of Part II - Specific Facility Terms and Conditions divided by A.III.3.a).

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 does not comply with the temperature limitation specified above.

The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was operating at maximum conditions during which the average

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temperature difference across the catalyst bed does not comply with the temperature limitation specified above.

2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 30.0 lbs/hr, and the actual average hourly VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to the renewal of the Title V permit to operate.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for VOC and the overall control efficiency limitations for VOC.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): For VOC Methods 1-4 and 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the overall efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - e. 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.)
 - f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and

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procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
3. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
4. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.
5. Compliance with the emission limitations and control efficiencies in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

a control efficiency which is at least ninety per cent, by weight, and an overall control efficiency which is at least seventy per cent, by weight

Applicable Compliance Method:

Compliance with the allowable capture efficiency for VOC shall be determined using Method 204 through 204F in 40 CFR Part 51, Appendix M or using an alternative method or procedure in accordance with USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. Compliance with the allowable control efficiency for VOC shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. Compliance with the allowable capture and control efficiencies for VOC shall also be determined through the monitoring and record keeping requirements in section A.III of these terms and conditions.

b. Emission Limitation:

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30.0 lbs/hr of VOC

Applicable Compliance Method:

Monthly record keeping as required in sections A.3.b of Part II - Specific Facility Terms and Conditions and A.III.3 of the Terms and Conditions for this emissions unit.

c. Emission Limitation:

25.0 tpy of VOC

JPS P:

PTI A

Emissions Unit ID: K016

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Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions section A.3.b of this permit, monthly record keeping of the coating and solvent usage and the VOC content, in weight percent, of each coating and solvent shall be maintained as a demonstration of compliance with this emissions limitation.

VI. Miscellaneous Requirements

None

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>
8-color flexographic printing press with outboard flexographic coater - PC VISION controlled with catalytic incinerator #2 *Modification (installation of outboard coater)	OAC rule 3745-31-05	See B.III.1 and B.VI below.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

JPS P:

PTI A

Emissions Unit ID: K016

Issued: To be entered upon final issuance**IV. Reporting Requirements**

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K016) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

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TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m³): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m³): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 11714.3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air

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"Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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>
9-color narrow flexographic printing press - COMCO 2	OAC rule 3745-31-05	1.4 lbs/hr of volatile organic compounds (VOC)
	OAC rule 3745-21-09(Y)	1.0 tpy of VOC See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The volatile organic compound content of the coatings and inks shall not exceed the following limitations:
 - i. forty percent VOC by volume of the coating or ink, excluding water and exempt solvents; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coating or ink.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:

- a. the name and identification number of each coating and ink, as applied;
- b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); and

JPS P:

PTI A

Emissions Unit ID: K017

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- c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall maintain monthly records of the following information:
 - a. the linear feet of material produced by this emissions unit;
 - b. the total linear feet of material produced by all of the emissions units that do not employ control equipment;
 - c. the total number of hours this emissions unit was in operation;
 - d. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per month (A.III.2.a divided by A.III.2.b and then multiplied by A.3.a.xiii of Part II - Specific Facility Terms and Conditions); and
 - e. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per hour (A.III.2.d divided by A.III.2.c).

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 1.4 lbs/hr, and the actual average hourly VOC emissions for each such month.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink

- Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

- b. Emission Limitation:

1.4 lbs/hr of VOC

- Applicable Compliance Method:

Compliance shall be demonstrated using the record keeping as required by Section A.III.2 of these terms and conditions or by emission testing pursuant to OAC rule 3745-21-10(C).

- c. Emission Limitation:

1.0 tpy of VOC

- Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions Section A.3.a of this permit, monthly record keeping of the coating and cleanup usage and the VOC content, in weight percent, as applied, of each coating and cleanup material shall be maintained as a demonstration of compliance with this emissions limitation.

VI. Miscellaneous Requirements

None

JPS P:

PTI A

Emissions Unit ID: K017

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>
9-color narrow flexographic printing press - COMCO 2	OAC rule 3745-31-05	See B.III.1 and B.VI below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

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V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K017) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983

JPS Packaging**PTI Application: 16-03024****Issued****Facility ID: 1677000105**

Emissions Unit ID: K017

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 23404.8

Pollutant: n-propyl acetate

TLV (mg/m3): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m3): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 11714.3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters

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used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

JPS P:

PTI A

Emissions Unit ID: K018

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>
9-color narrow flexographic printing press - COMCO 3	OAC rule 3745-31-05	1.4 lbs/hr of volatile organic compounds (VOC)
	OAC rule 3745-21-09(Y)	1.0 tpy of VOC See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The volatile organic compound content of the coatings and inks shall not exceed the following limitations:
 - a. forty percent VOC by volume of the coating or ink, excluding water and exempt solvents; or
 - b. twenty-five percent VOC by volume of the volatile matter in the coating or ink.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating and ink, as applied;

- b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); and
- c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

- 2. The permittee shall maintain monthly records of the following information:
 - a. the linear feet of material produced by this emissions unit;
 - b. the total linear feet of material produced by all of the emissions units that do not employ control equipment;
 - c. the total number of hours this emissions unit was in operation;
 - d. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per month (A.III.2.a divided by A.III.2.b and then multiplied by A.3.a.xiii of Part II - Specific Facility Terms and Conditions); and
 - e. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per hour (A.III.2.d divided by A.III.2.c).

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 1.4 lbs/hr, and the actual average hourly VOC emissions for each such month.
- 3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

JPS P:

PTI A

Emissions Unit ID: K018

Issued: To be entered upon final issuance**V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

aEmission Limitation:

forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

bEmission Limitation:

1.4 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated using the record keeping as required by Section A.III.2 of these terms and conditions or by emission testing pursuant to OAC rule 3745-21-10(C).

cEmission Limitation:

1.0 tpy of VOC

Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions Section A.3.a of this permit, monthly record keeping of the coating and cleanup usage and the VOC content, in weight percent, as applied, of each coating and cleanup material shall be maintained as a demonstration of compliance with this emissions limitation.

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JPS Packaging

PTI Application: 16-02024

Issued

Facility ID: 1677000105

Emissions Unit ID: K018

VI. Miscellaneous Requirements

None

JPS P:

PTI A

Emissions Unit ID: K018

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>
9-color narrow flexographic printing press - COMCO 3	OAC rule 3745-31-05	See B.III.1 and B.VI below.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

Issued: To be entered upon final issuance

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K018) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983

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PTI A

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Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7455.72

MAGLC (ug/m3): 23404.8

Issued: To be entered upon final issuance

Pollutant: n-propyl acetate

TLV (mg/m³): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m³): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 11714.3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound

JPS Packaging**PTI Application: 16-03024****Issued****Facility ID: 1677000105**

Emissions Unit ID: K018

with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

JPS P:
PTI A

Emissions Unit ID: K019

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>
9-color narrow flexographic printing press - COMCO 4	OAC rule 3745-31-05	1.4 lbs/hr of volatile organic compounds (VOC)
		1.0 tpy of VOC
	OAC rule 3745-21-09(Y)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The volatile organic compound content of the coatings and inks shall not exceed the following limitations:
 - i. forty percent VOC by volume of the coating or ink, excluding water and exempt solvents; or
 - ii. twenty-five percent VOC by volume of the volatile matter in the coating or ink.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating and ink, as applied;

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- b. the VOC content in percentage VOC by volume of each coating and ink (excluding water and exempt solvents); and
- c. the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall maintain monthly records of the following information:
 - a. the linear feet of material produced by this emissions unit;
 - b. the total linear feet of material produced by all of the emissions units that do not employ control equipment;
 - c. the total number of hours this emissions unit was in operation;
 - d. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per month (A.III.2.a divided by A.III.2.b and then multiplied by A.3.a.xiii of Part II - Specific Facility Terms and Conditions); and
 - e. the average, uncontrolled VOC emission rate for this emissions unit, in pounds per hour (A.III.2.d divided by A.III.2.c).

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the VOC emissions exceeded 1.4 lbs/hr, and the actual average hourly VOC emissions for each such month.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

a.Emission Limitation:

forty percent VOC by volume of the coating and ink, excluding water and exempt solvents or twenty-five percent VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee 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.

b.Emission Limitation:

1.4 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated using the record keeping as required by Section A.III.2 of these terms and conditions or by emission testing pursuant to OAC rule 3745-21-10(C).

c.Emission Limitation:

1.0 tpy of VOC

Applicable Compliance Method:

In accordance with Part II - Specific Facility Terms and Conditions Section A.3.a of this permit, monthly record keeping of the coating and cleanup usage and the VOC content, in weight percent, as applied, of each coating and cleanup material shall be maintained as a demonstration of compliance with this emissions limitation.

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JPS P:

PTI A

Issued: To be entered upon final issuance

VI. Miscellaneous Requirements

Emissions Unit ID: K019

None

JPS P:

PTI A

Emissions Unit ID: K019

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>
9-color narrow flexographic printing press - COMCO 4	OAC rule 3745-31-05	See B.III.1 and B.VI below.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit (K019) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl alcohol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 44761.9

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

MAGLC (ug/m³): 34285.7

Pollutant: isopropyl alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72

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MAGLC (ug/m3): 23404.8

Emissions Unit ID: K019

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Emissions Unit ID: K019

Issued: To be entered upon final issuance

Pollutant: n-propyl acetate

TLV (mg/m³): 835

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 19881.0

Pollutant: methyl ethyl ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 14047.6

Pollutant: n-propyl alcohol

TLV (mg/m³): 492

Maximum Hourly Emission Rate (lbs/hr): 128.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7455.72MAGLC (ug/m³): 11714.3

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

JPS P:

PTI A

Emissions Unit ID: K019

Issued: To be entered upon final issuance

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024 Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635, originally issued 7/1/98 for modification to K008 (addition of rotogravure printing station), seven flexographic printing presses, & 3 laminators. CITY/TWP Akron

SIC CODE 2671 SCC CODE 4-05-003-01 EMISSIONS UNIT ID K008

EMISSIONS UNIT DESCRIPTION Flexographic printing press with outboard rotogravure coater - W&H II

DATE INSTALLED 12/97

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			10	49	25
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?

incinerator

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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*? x YES NOIDENTIFY THE AIR CONTAMINANTS: ethyl alcohol, ethyl acetate, isopropyl alcohol, n-propyl acetate, n-propyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024

Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635. originallv CITY/TWP Akron

Emissions Unit ID: K019

laminators.

SIC CODE 2671

SCC CODE 4-05-003-01

EMISSIONS UNIT ID K013

EMISSIONS UNIT DESCRIPTION Flexographic printing press - W&H IV

DATE INSTALLED 2/97

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			10	30	25
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?

incinerator

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: ethyl alcohol, ethyl acetate, isopropyl alcohol, n-propyl acetate, n-propyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024

Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635. originally CITY/TWP Akron

Emissions Unit ID: K019

laminators.

SIC CODE 2671

SCC CODE 4-05-003-01

EMISSIONS UNIT ID K014

EMISSIONS UNIT DESCRIPTION Flexographic printing press - PC IV

DATE INSTALLED 2/97

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			10	46	25
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?

incinerator

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: ethyl alcohol, ethyl acetate, isopropyl alcohol, n-propyl acetate, n-propyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024

Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635. originallv CITY/TWP Akron

Emissions Unit ID: K019

laminators.

SIC CODE 2671 SCC CODE 4-05-003-01 EMISSIONS UNIT ID K015

EMISSIONS UNIT DESCRIPTION Flexographic printing press - Solo 1

DATE INSTALLED 2/97

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			5	15	10
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?

incinerator

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: ethyl alcohol, ethyl acetate, isopropyl alcohol, n-propyl acetate, n-propyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024 Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635. originallv CITY/TWP Akron

Emissions Unit ID: K019

laminators.

SIC CODE 2671 SCC CODE 4-05-003-01 EMISSIONS UNIT ID K016

EMISSIONS UNIT DESCRIPTION Flexographic printing press - vision *Modification

DATE INSTALLED 2/97

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			10	30	25
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?

incinerator

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: ethyl alcohol, ethyl acetate, isopropyl alcohol, n-propyl acetate, n-propyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024 Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635. originally CITY/TWP Akron

Emissions Unit ID: K019

laminators.

SIC CODE 2671 SCC CODE 4-05-003-01 EMISSIONS UNIT ID K017

EMISSIONS UNIT DESCRIPTION Flexographic printing press and laminator - Comco II

DATE INSTALLED 2/97

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				1.4	1
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

compliance with additional terms and conditions

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: ethyl alcohol, ethyl acetate, isopropyl alcohol, n-propyl acetate, n-propyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024 Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635. originally CITY/TWP Akron

Emissions Unit ID: K019

laminators.

SIC CODE 2671 SCC CODE 4-05-003-01 EMISSIONS UNIT ID K018

EMISSIONS UNIT DESCRIPTION Flexographic printing press and laminator - Comco II

DATE INSTALLED 2/97

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				1.4	1
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

compliance with additional terms and conditions

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: ethyl alcohol, ethyl acetate, isopropyl alcohol, n-propyl acetate, n-propyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024 Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635. originally CITY/TWP Akron

Emissions Unit ID: K019

laminators.

SIC CODE 2671 SCC CODE 4-05-003-01 EMISSIONS UNIT ID K019

EMISSIONS UNIT DESCRIPTION Flexographic printing press and laminator - Comco IV

DATE INSTALLED 2/97

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			1	1.4	1
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

compliance with additional terms and conditions

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
 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*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: ethyl alcohol, ethyl acetate, isopropyl alcohol, n-propyl acetate, n-propyl alcohol

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024

Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635. originally CITY/TWP Akron

Emissions Unit ID: K019

laminators.

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

As the modification does not change any short-term limitations, calcs and air toxics modeling do not change and were approved already in PTI 16-1635.

Please provide any additional permit specific notes as you deem necessary:

This is a chapter 31 modification to PTI #16-1635. The reason for the modification is the addition of an outboard coating station on K016. The result will be an tpy increase from 12.8 tpy to 25.0 tpy VOC.

Permit To Install Synthetic Minor Write-Up

A. Source Description:

JPS Packaging is an existing Title V facility located in Akron, Summit County that does flexographic printing. The facility consists of 16 significant active existing sources which are 3 above ground storage tanks (T001 - T003) and 13 flexographic printing presses (K003, K005 - K006, K008, K010, and K012 - K019). JPS wishes to modify one of the flexographic presses (K016) by adding an outboard flexographic printing station to allow for one color backside printing. This source was previously permitted as part of PTI 16-1635 which was a synthetic minor permit enabling the facility to avoid both PSD and 40 CFR Part 63, subpart KK (printing and publishing MACT) permitting requirements. As the facility wishes to maintain these synthetic restrictions, the previous permit has been reincorporated again with the modification to K016. With the issuance of this PTI, the previous PTI 16-1635 will be superseded and the facility will still have federally enforceable limitations allowing them to avoid PSD and MACT.

B. Facility Emissions and Attainment Status:

Current facility emissions have been below 250 tpy VOC, and also 10 tpy of any individual HAP and 25 tpy for all combined HAPs. The emissions have been tracked on a monthly basis as required in previous PTI, and this will continue to occur for this permit as well. Maintaining facility emissions below these thresholds, ensures that JPS is able to avoid the requirements of both PSD and MACT.

C. New Source Emissions

The modification to flexographic printing press K016 will not increase the short-term emission limitation for that press. The facility wishes to increase their ton per year VOC allowable on that press to allow for some production flexibility.

D. Conclusion:

The modification of K016 will not affect facility wide emissions and through the record keeping requirements the facility will continue to demonstrate that annual emissions enable them to avoid PSD and MACT permitting requirements. This permit will replace the previous synthetic minor permit #16-1635.

Please fill in the following for this permit:

NEW SOURCE REVIEW FORM B

PTI Number: 16-02024

Facility ID: 1677000105

FACILITY NAME JPS Packaging - DBA Sealright

FACILITY DESCRIPTION Modification to PTI 16-1635. originally CITY/TWP Akron

Emissions Unit ID: K019

laminators.

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	249.9
Single HAP	9.9
Combined HAP	24.9