



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION**  
**SUMMIT COUNTY**  
Application No: 16-01635

CERTIFIED MAIL

DATE: 11/2/2000

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

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

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

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

Very truly yours,

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

CC: USEPA

ARAQMD



Permit To Install  
Terms and Conditions

Issue Date: 11/2/2000  
Effective Date: 11/2/2000

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 16-01635

Application Number: **16-01635**  
APS Premise Number: **1677000105**  
Permit Fee: **\$500**  
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 modification:  
**Modification to PTI #16-1635 issued 07/01/98 to allow change in efficiency from 80 percent to 70 percent for emissions units K008,K013,K014, K015, and K016.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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## **GENERAL PERMIT CONDITIONS**

### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

### **CONSTRUCTION OF NEW SOURCE(S)**

The proposed source(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 source(s) has already begun or has been completed prior to the date the Director of the Ohio 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 Ohio Administrative Code (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.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

### **BEST AVAILABLE TECHNOLOGY**

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

### **PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

### **NINETY DAY OPERATING PERIOD**

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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### AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Jaite Packaging dba Sealright** located in **Summit** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K008	K015	K018	Flexographic printing press with outboard roto gravure coater - W&H II	Flexographic printing press - Solo 1
K013	K016	K019	Flexographic printing press - W&H IV	Flexographic printing press - vision
K014	K017		Flexographic printing press - PC IV	Flexographic printing press and laminator -

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Comco II	Catalytic incinerator	Compliance with the terms and conditions of this permit	3745-31-05 3745-21-09(Y)	3745-31-05 3745-21-09(Y)
Flexographic printing press and laminator - Comco III	Catalytic incinerator	Compliance with the terms and conditions of this permit	3745-31-05 3745-21-09(Y)	3745-31-05 3745-21-09(Y)
	Thermal incinerator	Compliance with the terms and conditions of this permit	3745-31-05 3745-21-09(Y)	3745-31-05 3745-21-09(Y)
Flexographic printing press and laminator - Comco IV	Catalytic incinerator		3745-31-05 3745-21-09(Y)	
	Catalytic incinerator		3745-31-05 3745-21-09(Y)	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
49.0 pounds/hour volatile organic compound (VOC)	ns)	1.4 pounds/hour VOC		
25.0 TPY VOC	46.0 pounds/hour VOC	1.0 TPY VOC		
(See Additional Special Terms and Conditions)	25.0 TPY VOC	(See Additional Special Terms and Conditions)		
25.0 TPY VOC	(See Additional Special Terms and Conditions)	1.4 pounds/hour VOC		
(See Additional Special Terms and Conditions)	15.0 pounds/hour VOC	1.0 TPY VOC		
30.0 pounds/hour VOC	10 TPY VOC	(See Additional Special Terms and Conditions)		
30.0 pounds/hour VOC	(See Additional Special Terms and Conditions)	1.4 pounds/hour VOC		
25.0 TPY VOC	30.0 pounds/hour VOC	1.0 TPY VOC		
(See Additional Special Terms and Conditions)	12.8 TPY VOC	(See Additional Special Terms and Conditions)		
25.0 TPY VOC	(See Additional Special Terms and Conditions)	1.4 pounds/hour VOC		
(See Additional Special Terms and Conditions)	1.0 TPY VOC	1.0 TPY VOC		
(See Additional Special Terms and Conditions)	(See Additional Special Terms and Conditions)	(See Additional Special Terms and Conditions)		

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SUMMARY  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

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

\*Facility-wide cap

**PERFORMANCE TEST REQUIREMENTS**

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutant(s):

**Source**

**K016**

**K008, K013,  
 K014, K015 and**

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**Pollutant(s)**

VOC

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Akron Air Pollution Control, 177 South Broadway, Akron, OH 44308.**

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Air Pollution Control, 177 South Broadway, Akron, OH 44308**.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

#### **I. Facility Wide**

##### **A. Additional Terms and Conditions**

1. Jaite 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.
2. Jaite Packaging d.b.a. Sealright has accepted these emission limits as a facility-wide cap on emissions from units K003, K005, K006, K008, K010, K012, K013, K014, K015, K016, K017, K018, K019, T001, T002, and T003. With the issuance of this Permit to Install (PTI), this facility shall operate under federally enforceable limits.
3. 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:

Months

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	Maximum Allowable Cumulative Emissions of VOC	Maximum allowable cumulative Emissions of Individual HAP	Maximum allowable cumulative Emissions of total combined HAPs
1			
1-2			
1-3			
1-4			
1-5	20.8 tons	1.0 ton	2.0 tons
1-6	41.7 tons	2.0 tons	4.0 tons
1-7	62.5 tons	3.0 tons	6.0 tons
1-8	83.3 tons	4.0 tons	8.0 tons
1-9	104.1 tons	5.0 tons	
1-10	125.0 tons	6.0 tons	10.0 tons
1-11	144.8 tons	6.7 tons	12.0 tons
1-12	166.6 tons	7.3 tons	14.2 tons
	187.4 tons	8.0 tons	16.3 tons
	208.4 tons	8.6 tons	18.5 tons
	229.1 tons	9.3 tons	20.6 tons
	249.9 tons	9.9 tons	22.8 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.

**B. Operational Restrictions**

1. None.

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

1. In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for the entire facility which consists of these emission 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
    - i. the name and identification of each coating, as applied;
    - ii. the VOC content of each coating, as applied, in weight percent. This should include any thinning solvents added to the coatings at the facility;

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- iii. the individual HAP content for each HAP of each coating in weight percent, as applied;
  - iv. the total combined HAP content of each coating in weight percent, as applied (sum all the individual HAP contents from I.C.1.a.iii);
  - v. the total pounds of each coating employed;
  - vi. the name and identification of each cleanup material employed;
  - vii. the VOC content of each cleanup material, in weight percent;
  - viii. the individual HAP content for each HAP of each cleanup material in weight percent, as applied;
  - ix. the total combined HAP content of each cleanup material in weight percent, as applied (sum all the individual HAP contents from I.C.1.a.viii);
  - x. the total pounds of each cleanup material employed;
  - xi. the total uncontrolled individual HAP emissions for each HAP for all coatings and cleanup materials employed, in tons per month (for each HAP the sum of I.C.1.a.iii divided by 100 times I.C.1.a.v for each coating and the sum of I.C.1.a.viii divided by 100 times I.C.1.a.x for each cleanup material);
  - xii. the total uncontrolled total combined HAPs emissions for all coatings and cleanup materials employed, in tons per month (the sum of I.C.1.a.iv divided by 100 times I.C.1.a.v for each coating and the sum of I.C.1.a.ix divided by 100 times I.C.1.a.x for each cleanup material); and,
  - xiii. the total uncontrolled VOC emissions for all coatings and cleanup materials employed, in tons per month (the sum of I.C.1.a.ii divided by 100 times I.C.1.a.v for each coating and the sum of I.C.1.a.vii divided by 100 times I.C.1.a.x for each cleanup material).
- b. for emissions units with control equipment
- i. the name and identification of each coating, as applied;
  - ii. the VOC content of each coating, as applied, in weight percent. This should include any thinning solvents added to the coatings at the facility;
  - iii. the individual HAP content for each HAP of each coating in weight percent, as applied;

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- iv. the total combined HAP content of each coating in weight percent, as applied (sum all the individual HAP contents from I.C.1.b.iii);
- v. the total pounds of each coating employed;
- vi. the name and identification of each cleanup material employed;
- vii. the VOC content of each cleanup material, in weight percent;
- viii. the individual HAP content for each HAP of each cleanup material in weight percent, as applied;
- ix. the total combined HAP content of each cleanup material in weight percent, as applied (sum all the individual HAP contents from I.C.1.b.viii);
- x. the total pounds of each cleanup material employed;
- xi. the total uncontrolled individual HAP emissions for each HAP for all the coatings and cleanup materials employed, in tons per month (for each HAP the sum of I.C.1.b.iii divided by 100 times I.C.1.b.v for each coating and the sum of I.C.1.b.viii divided by 100 times I.C.1.b.x for each cleanup material);
- xii. the total uncontrolled total combined HAPs emissions for all the coatings and cleanup materials employed, in tons per month (the sum of I.C.1.b.iv divided by 100 times I.C.1.b.v for each coating and the sum of I.C.1.b.ix divided by 100 times I.C.1.b.x for each cleanup material);
- xiii. the total uncontrolled VOC accounted for in all coatings and cleanup materials employed, in tons per month (the sum of I.C.1.b.ii divided by 100 times I.C.1.b.v for each coating and the sum of I.C.1.b.vii divided by 100 times I.C.1.b.x for each cleanup material);
- 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 (I.C.1.b.xiii minus I.C.1.b.xv);
- xvii. the feet of material produced by each emissions unit;
- xviii. the total 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

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emissions units, in tons per month (for each emissions unit I.C.1.b.xvii divided by I.C.1.b.xviii multiplied by I.C.1.b.xi);

- xx. the total uncontrolled total combined HAPs emissions for each emissions units, in tons per month (for each emissions unit I.C.1.b.xvii divided by I.C.1.b.xviii multiplied by I.C.1.b.xii);
- xxi. the total VOC emissions for each emissions units, in tons per month (for each emissions unit I.C.1.b.xvii divided by I.C.1.b.xviii multiplied by I.C.1.b.xvi);
- xxii for each emissions unit, the calculated, controlled individual HAP emission rate for all coatings and cleanup materials, 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;
- xxiii for each emissions unit, the calculated, controlled total combined HAPs emission rate for all coatings and cleanup materials, 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 cleanup materials, 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 I.C.1.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 I.C.1.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 I.C.1.b.xxiv).

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c. Facility Emissions

- i. the total individual HAP emissions for the entire facility, in tons per month (I.C.1.a.xi plus I.C.1.b.xxv);
- ii. the total combined HAPs emissions for the entire facility, in tons per month (I.C.1.a.xii plus I.C.1.b.xxvi);
- iii. the total VOC emissions for the entire facility, in tons per month (I.C.1.a.xiii plus I.C.1.b.xxvii plus 3.0 tons per year\* divided by 12);
- iv. during the first 12 calendar months of operations following the issuance of this permit, the permittee shall record the cumulative emissions of individual HAP, total combined HAPs, and VOC for the entire facility for each calendar month; and,

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- 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 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.
2. 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.

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

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation 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.
2. 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 information shall be submitted to the Akron Air Pollution Control; and,
  - 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 promptly made to the Akron Air Pollution Control. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06.

If no deviations occurred during a calendar quarter, the permittee shall submit a

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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.

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 Akron Air Pollution Control every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements.

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.

3. 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); and,
  - 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.

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

4. The permittee shall submit an initial notification as required by 40 CFR Part 63, subpart KK. The initial notification shall be submitted to Akron Regional Air Quality Management District within thirty (30) days after the issuance of the final Permit to Install.

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

1. Compliance with the emission limitation(s) in Section I.A. of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission Limitation

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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

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Applicable Compliance Method

In accordance with I.C of these terms and conditions, monthly recordkeeping of the VOC content, individual HAP content, and total combined HAP content in weight percent as applied of each coating and cleanup material and the total pounds of each coating and cleanup material 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 organic compound contents of the coatings and inks. Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. None.

**II. K008, K013, K014, K015, K016, K017, K018, and K019**

**A. Additional Terms and Conditions**

1. None.

**B. Operational Restrictions**

1. None.

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

1. None.

**D. Reporting Requirements**

1. None.

**E. Testing Requirements**

1. None.

**F. Miscellaneous Requirements**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 16-1635. In conjunction with the best available

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technology requirements of OAC rule 3745-31-05, the VOC emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the ISC 3.0 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

**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

**Maximum Acceptable Ground-Level Concentration (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

**Maximum Acceptable Ground-Level Concentration (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

**Maximum Acceptable Ground-Level Concentration (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

**Maximum Acceptable Ground-Level Concentration (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

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):** 14047.6

**Pollutant:** n-propyl alcohol

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**TLV (mg/m3): 492**

**Maximum Hourly Emission Rate (lbs/hr): 128.2\***

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

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 11714.3**

\* The maximum hourly emission rate is the summation of the allowable mass emissions for K013 through K019 plus the 3.0 pounds/hr increase in the allowable for K008.

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Akron Air Pollution Control are required, including the possible issuance of modifications to PTI number 16-1635 and the operating permit:

a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;

b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,

e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

2. The permittee shall increase the stack height of "E-5" to 38 feet above the ground within 6 months after the final permit to install is issued.

### **III. K008, K013, K014, K015, and K016**

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**A. Additional Terms and Conditions**

1. Printing lines K008, K013, K014, K015, and K016 shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:
  - a. 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.

**B. Operational Restrictions**

1. None.

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

1. None.

**D. Reporting Requirements**

1. None.

**E. 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 six months after the issuance of the final Permit to Install of K008, K013, K014, K015, and K016;
  - 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 Akron Air Pollution Control;
  - e. the capture efficiency shall be determined using Methods 204 through 204F, as specified

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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); and,

- 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.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Air Pollution Control. 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 Akron Air Pollution Control's refusal to accept the results of the emission test(s).
4. Personnel from the Akron Air Pollution Control 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.
5. 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 Akron Air Pollution Control 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 Akron Air Pollution Control.
6. Compliance with the emission limitation(s) in Section III.A. of these terms and conditions and the Emission Summary of this Permit to Install shall be determined in accordance with the following method(s):
  - a. Emission Limitation

A control efficiency which is at least ninety percent by weight and an overall control

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efficiency which is at least seventy percent 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 recordkeeping requirements in sections IV.C and V.C of these terms and conditions.

b. Emission Limitation

K008 - 49.0 lbs/hr VOC

K013 - 30.0 lbs/hr VOC

K014 - 46.0 lbs/hr VOC

K015 - 15.0 lbs/hr VOC

K016 - 30.0 lbs/hr VOC

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Applicable Compliance Method

Compliance with the allowable mass emission rates for VOC shall be determined in accordance with Methods 1-4, and 25 of 40 CFR Part 60, Appendix A and monitoring and recordkeeping as required by sections IV.C and V.C of these terms and conditions.

c. Emission Limitation

- K008 - 25.0 TPY VOC
- K013 - 25.0 TPY VOC
- K014 - 25.0 TPY VOC
- K015 - 10.0 TPY VOC
- K016 - 12.8 TPY VOC

Applicable Compliance Method

In accordance with I.C of these terms and conditions, monthly recordkeeping of the coating and cleanup usage and the VOC content in weight percent as applied of each coating and cleanup material.

**F. Miscellaneous Requirements**

- 1. None.

**IV. K008, K013, K015, and K016**

**A. Additional Terms and Conditions**

- 1. None.

**B. Operational Restrictions**

- 1. None.

**C. 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

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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. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and,
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;
3. The permittee shall perform the following procedures to monitor the catalytic incinerator:
  - a. twice a year, once in April and once in October, a JM's Synthetic gas mix Catalyst Activity Test (SCAT) test shall be performed. If the SCAT indicates that the 90 percent conversion temperature is greater than 100 degrees Fahrenheit relative to a typical fresh catalyst after catalyst washing, this facility shall either wash or replace the catalyst within 90 days; and,
  - b. twice a year, once in June and once in December, the equipment supplier or a comparably qualified company shall perform a flame ionization detection (FID) test to measure the concentration of the volatile organic compounds at the inlet and outlet of the catalytic incinerator. If the FID test indicates that the control efficiency is under 90 percent, then the facility will determine if the problem is mechanical or if the problem is the catalyst. If the problem is mechanical (i.e. low air velocity, instrumentation, or broken dampers), then the facility shall repair the mechanical problem within 14 days. If the catalyst is the problem, then the facility shall test and proceed as required in section IV.C.2.a of this permit.
4. The permittee shall continue implementing the preventative maintenance plan which includes the following:
  - a. every 90 days the following types of equipment shall be inspected and replaced if necessary: belts, thermocouples, etc.;
  - b. twice a year, once in June and once in December, the manufacturer of the catalytic

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incinerator shall examine the equipment. Any minor repairs shall be completed within 14 days. Any major repairs shall be completed within 90 days; and,

- c. once a year, the major components of the catalytic incinerator (i.e. bearings, insulation, flame detectors, etc.) shall be inspected and repaired if necessary.
5. The permittee shall maintain the results from the SCAT and FID tests and record any corrective actions that were taken.
6. The permittee shall maintain a log of preventative maintenance that is performed. The log shall contain the dates of any maintenance inspections, what components of the equipment were inspected, and if any component were replaced or repaired.
7. 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.

**D. Reporting Requirements**

1. The permittee shall submit quarterly summaries of the following records:
  - a. a log of operating time for the capture (collection ) system, control device, monitoring equipment, and the associated emissions unit;
  - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and,
  - c. the results of any SCAT or FID test that indicated that the catalytic incinerator was not operating properly and the corrective actions or preventive measures taken to correct the problem.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

**E. Testing Requirements**

1. None.

**F. Miscellaneous Requirements**

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1. None.

**V. K014**

**A. Additional Terms and Conditions**

1. None.

**B. Operational Restrictions**

1. None.

**C. 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 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 operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; 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 more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
3. 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.

**D. Reporting Requirements**

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1. The permittee shall submit quarterly summaries of the following records:
  - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; 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 more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

**E. Testing Requirements**

1. None.

**F. Miscellaneous**

1. None.

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**VI. K017, K018, and K019**

**A. Additional Terms and Conditions**

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

**B. Operational Restrictions**

1. None.

**C. 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, as applied;
  - b. the VOC content in percentage VOC by volume of the coating and ink (excluding water and exempt solvents); or,
  - c. the VOC content in percentage VOC by volume of the volatile matter in the 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 feet of material produced by K017, K018, and K019;
  - b. the total feet of material produced by all of the emissions units that do not employ

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- control equipment;
  - c. the total number of hours K017, K018, and K019 was in operation;
  - d. the average, uncontrolled VOC emission rate for each emissions unit in pounds per month (VI.C.2.a divided by VI.C.2.b multiplied by I.C.1.a.xiii); and,
  - e. the average, uncontrolled VOC emission rate for each emissions unit in pounds per hour (VI.C.2.d divided by VI.C.2.c).
3. 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.

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

1. The permittee shall notify the Director (the Akron Air Pollution Control) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Air Pollution Control) within 30 days following the end of the calendar month.

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

1. Compliance with the emission limitation(s) in Section VI.A. of these terms and conditions and the Emissions Summary of this Permit to Install shall be determined in accordance with the following method(s):

- 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.

- a. 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

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CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation

K017 - 1.4 lbs/hr VOC

K018 - 1.4 lbs/hr VOC

K019 - 1.4 lbs/hr VOC

Applicable Compliance Method

Recordkeeping as required by section VI.C.2 of these terms and conditions or use OAC rule 3745-21-10(C).

c. Emission Limitation

K017 - 1.0 TPY VOC

K018 - 1.0 TPY VOC

K019 - 1.0 TPY VOC

Applicable Compliance Method

Recordkeeping as required by section VI.C.2 of these terms and conditions.

**F. Miscellaneous Requirements**

1. None.