



State of Ohio Environmental Protection Agency

**RE: FINAL 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: 16-02304

DATE: 10/28/2003

Pechiney Plastic Packaging Inc
Thomas Hudson
1972 Akron-Peninsula Rd
Akron, OH 44313

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

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

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

ARAQMD



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 10/28/2003
Effective Date: 10/28/2003**

FINAL PERMIT TO INSTALL 16-02304

Application Number: 16-02304
APS Premise Number: 1677000105
Permit Fee: **\$400**
Name of Facility: Pechiney Plastic Packaging Inc
Person to Contact: Thomas Hudson
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):
Chapter 31 modification to supercede PTI 16-02213 issued final on 4/23/2002 to allow the use of photochemically reactive materials and hazardous air pollutants for emissions units P007 and P008.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. 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.9 below if no deviations occurred during the quarter.

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

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

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

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

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

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

Pechiney Plastic Packaging Inc
PTI Application: **16-02304**
Issued: 10/28/2003

Facility ID: **1677000105**

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.

Emissions Unit ID: P007

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	4.36
combined HAPs	0.04

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PTI Application: **16-02304**
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Facility ID: **1677000105**

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Issued: 10/28/2003

Emissions Unit ID: P007

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P007 - Flexographic Plate Making Process - DUPONT 1 (the terms and conditions in this permit supercede the terms and conditions in PTI 16-022213 issued 4/23/2002).	OAC rule 3745-31-05(A)(3)	<p>0.39 pound of organic compounds (OC) per hour</p> <p>1.92 tons of OC per year including cleanup material emissions</p> <p>0.017 ton of combined hazardous air pollutants (HAPs) per year</p> <p>See A.I.2.a below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-21-07(G)(6).</p>
	OAC rule 3745-21-07(G)(2)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide, in accordance with test methods and

procedures identified in Part
III.A.V.1.e.

2. Additional Terms and Conditions

- 2.a** The hourly OC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

II. Operational Restrictions

1. The OC emissions from the plate wash section, the dryer unit, and the anti-tack unit shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.
2. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. The permittee shall not employ any cleanup material that meets the definition of photochemically reactive material as defined by OAC rule 3745-21-01(C)(5) for this process (i.e., cleaning of the film negatives etc.).
4. The permittee shall not employ any cleanup material which contains any of the hazardous air pollutants (HAPs) listed in section 112(b) of the Clean Air Act for this process (i.e., cleaning of the film negatives etc.).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the plate wash section, the dryer unit, and/or the anti-tack unit were not vented to the thermal incinerator (oxidizer).
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). 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.
3. The permittee shall collect and record all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator

Emissions Unit ID: P007

(oxidizer) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

4. The permittee shall maintain the following information for this emissions unit:
 - a. the identification of each cleanup material employed for this process;
 - b. the MSDS sheets for each cleanup material employed for this process;
 - c. documentation as to whether or not each cleanup material is a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5); and
 - d. documentation as to whether or not each cleanup material contains any HAPs listed in section 112(b) of the Clean Air Act.

5. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the amount of photopolymer plates produced, in square feet per month;
 - b. the uncontrolled OC emission rate from the plate production, in pounds per month (i.e., (a) times 0.13 pound of OC per square foot of material processed*);
 - c. the controlled OC emission rate from the plate production, in tons per month (i.e., (b) times (1-0.85**), and then divided by 2000);
 - d. the combined HAPs content of the plate wash material, in weight percent;
 - e. the controlled combined HAPs emission rate from the plate production, in tons per month (i.e., (c) times ((d) divided 100));
 - f. the company identification for each cleanup material employed;
 - g. the number of pounds of each cleanup material employed;
 - h. the OC content of each cleanup material, in weight percent;
 - i. the OC emission rate for all cleanup materials, in tons per month (i.e., (g) times ((h) divided by 100), and then divided by 2000); and
 - j. the total OC emission rate, in tons per month (i.e., (c) plus (i)).

*Emission factor developed by the permittee in the document titled "Plate Wash Emission Calculation Spreadsheet" dated 2/18/02.

**Eighty-five percent overall control efficiency shall be used in the calculation unless stack testing

is performed for the capture efficiency and the control efficiency. If stack testing is performed for the capture efficiency and the control efficiency, then the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance shall be used in the calculation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the plate wash section, the dryer unit, and/or the anti-tack unit were not vented the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a photochemically reactive cleanup material (as defined in OAC rule 3745-21-01(C)(5))

Emissions Unit ID: P007

is employed for this process. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA or local air agency) within 45 days after such an occurrence.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a cleanup material which contains any HAPs listed in section 112(b) of the Clean Air Act is employed for this process. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office and local air agency) within 45 days after such an occurrence.
4. 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 (oxidizer) does not comply with the temperature limitation specified above. These reports are due in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.
5. The permittee shall submit annual reports that specify the total OC and total combined HAPs emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 prior to issuance of this permit or within 90 days of issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance the 90 percent, by weight, control efficiency limitation for OC. (Initial compliance to 90 percent, by weight, control efficiency to be satisfied during the initial destruction test for the new Megtec oxidizer.)
 - c. The test method(s) which must be employed to demonstrate compliance with the control efficiency limitations for OC 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 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.

Issued: 10/28/2003

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 emission 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 requirements in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

0.39 pound of OC per hour

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated by multiplying the OC emission factor of 0.13 pound of OC per square feet of material* by the maximum hourly production rate (in square feet).

*The emission factor was derived by the facility in the document entitled "Plate Wash Emission Calculation Spreadsheet" dated 2/18/02.
 - b. Emission Limitation:

1.92 tons of OC per year including cleanup material emissions

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through record keeping as required in section A.III.5 of these terms and conditions.

c. Emission Limitation:

0.017 ton of combined HAPs per year

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through record keeping as required in section A.III.5 of these terms and conditions.

d. Emission Limitation:

Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

e. Emission Limitation:

Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated based upon the emission testing requirement specified in section A.V.1 and capture testing 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.).

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install 16-02304 shall supersede all the air pollution

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Pechin

PTI A₁

Issued: 10/28/2003

Emissions Unit ID: P007

control requirements for P007 in permit to install 16-02213.

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>
P007 - Flexographic Plate Making Process - DUPONT 1 (the terms and conditions in this permit supercede the terms and conditions in PTI 16-022213 issued 4/23/2002).	None	See B.VI.1 below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

Pechiney Plastic Packaging Inc

PTI Application: 16-02304

Issued

Facility ID: 1677000105

Emissions Unit ID: P007

to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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>
P008 - Flexographic Plate Making Process - DUPONT 2 (the terms and conditions in this permit supercede the terms and conditions in PTI 16-022213 issued 4/23/2002).	OAC rule 3745-31-05(A)(3)	0.51 pound of organic compounds (OC) per hour 2.44 tons of OC per year including cleanup material emissions 0.023 ton of combined hazardous air pollutants (HAPs) per year See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-21-07(G)(6).
	OAC rule 3745-21-07(G)	Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-21-07(G)(6)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide, in accordance with test methods and procedures identified in Part III.A.V.1.e.

2. Additional Terms and Conditions

- 2.a The hourly OC emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this

limit.

II. Operational Restrictions

1. The VOC emissions from the plate wash/dryer/anti-tack unit shall be vented to the thermal incinerator (oxidizer) when the emissions unit is in operation.
2. The average combustion temperature within the thermal incinerator (oxidizer), for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
3. The permittee shall not employ any cleanup material that meets the definition of photochemically reactive material as defined by OAC rule 3745-21-01(C)(5) for this process (i.e., cleaning of the film negatives etc.).
4. The permittee shall not employ any cleanup material which contains any of the hazardous air pollutants (HAPs) listed in section 112(b) of the Clean Air Act for this process (i.e., cleaning of the film negatives etc.).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records documenting any time periods when the emissions unit was in operation and the emissions from the plate wash/dryer/anti-tack unit were not vented to the thermal incinerator (oxidizer).
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator (oxidizer). 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.
3. The permittee shall collect and record all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal incinerator (oxidizer) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.
4. The permittee shall maintain the following information for this emissions unit:
 - a. the identification of each cleanup material employed for this process;

- b. the MSDS sheets for each cleanup material employed for this process;
 - c. documentation as to whether or not each cleanup material is a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5); and
 - d. documentation as to whether or not each cleanup material contains any HAPs listed in section 112(b) of the Clean Air Act.
5. The permittee shall collect and record the following information for each month for this emissions unit:
- a. the amount of photopolymer plates produced, in square feet per month;
 - b. the uncontrolled OC emission rate from the plate production, in pounds per month (i.e., (a) times 0.09 pound of OC per square foot of material processed*);
 - c. the controlled OC emission rate from the plate production, in tons per month (i.e., (b) times (1-0.85**), and then divided by 2000);
 - d. the combined HAPs content of the plate wash material, in weight percent;
 - e. the controlled combined HAPs emission rate from the plate production, in tons per month (i.e., (c) times ((d) divided 100));
 - f. the company identification for each cleanup material employed;
 - g. the number of pounds of each cleanup material employed;
 - h. the OC content of each cleanup material, in weight percent;
 - i. the OC emission rate for all cleanup materials, in tons per month (i.e., (g) times ((h) divided by 100), and then divided by 2000); and
 - j. the total OC emission rate, in tons per month (i.e., (c) plus (i)).

*Emission factor developed by the permittee in the document titled "Plate Wash Emission Calculation Spreadsheet" dated 2/18/02.

**Eighty-five percent overall control efficiency shall be used in the calculation unless stack testing is performed for the capture efficiency and the control efficiency. If stack testing is performed for the capture efficiency and the control efficiency, then the overall control efficiency from the most recent emission test that demonstrated that the emissions unit was in compliance shall be used in the calculation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the emissions from the plate wash/dryer/anti-tack unit were not vented the thermal incinerator (oxidizer). Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a photochemically reactive cleanup material (as defined in OAC rule 3745-21-01(C)(5))

is employed for this process. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA or local air agency) within 45 days after such an occurrence.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a cleanup material which contains any HAPs listed in section 112(b) of the Clean Air Act is employed for this process. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office and local air agency) within 45 days after such an occurrence.
4. 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 (oxidizer) does not comply with the temperature limitation specified above. These reports are due in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.
5. The permittee shall submit annual reports that specify the total OC and total combined HAPs emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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 prior to issuance of this permit or within 90 days of issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance the 90 percent, by weight, control efficiency limitation for OC. (Initial compliance to 90 percent, by weight, control efficiency to be satisfied during the initial destruction test for the new Megtec oxidizer.)
 - c. The test method(s) which must be employed to demonstrate compliance with the control efficiency limitations for OC 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.

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- e. 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 emission 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 requirements in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.51 pound of OC per hour

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated by multiplying the OC emission factor of 0.09 pound of OC per square feet of material* by the maximum hourly production rate (in square feet).

*The emission factor was derived by the facility in the document entitled "Plate Wash Emission Calculation Spreadsheet" dated 2/18/02.
 - b. Emission Limitation:
2.44 tons of OC per year including cleanup material emissions

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Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through record keeping as required in section A.III.5 of these terms and conditions.

c. Emission Limitation:

0.023 ton of combined HAPs per year

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through record keeping as required in section A.III.5 of these terms and conditions.

d. Emission Limitation:

Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.1.

e. Emission Limitation:

Emissions of organic compounds shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated based upon the emission testing requirement specified in section A.V.1 and capture testing 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.).

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install 16-02304 shall supersede all the air pollution

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control requirements for P008 in permit to install 16-02213.

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>
P008 - Flexographic Plate Making Process - DUPONT 2 (the terms and conditions in this permit supercede the terms and conditions in PTI 16-022213 issued 4/23/2002).	None	See B.VI.1 below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit

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to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.