Synthetic Minor Determination and/or ☐ Netting Determination
Permit To Install: "16-02495"

A. Source Description

Pechiney Plastic Packaging, Inc. is an existing Title V facility located in Akron, Summit County that does flexographic printing. The facility currently consists of 14 existing sources which include three above ground storage tanks (T001 - T003), 8 flexographic printing presses (K003, K006, K008, K010, K013, K016, K018, and K020), and photopolymer plate making (P008, P009, and P010). Pechiney Plastic Packaging, Inc. wishes to install a new flexographic printing press (K021).

B. Facility Emissions and Attainment Status

Currently facility emissions which includes emissions units K003, K006, K010, K013, K016, K018, K020, T001, T002, and T003 are limited to 358.9 tons per rolling, 12-month period for volatile organic compounds (VOC), 9.9 tons per rolling, 12-month period for any individual hazardous air pollutant (HAP), and 24.9 tons per rolling, 12-month period for total combined HAPs. Pechiney Plastic Packaging, Inc. is currently a major source for VOC. Summit County is nonattainment for ozone.

C. Source Emissions

Emissions unit K021 has a potential to emit for VOC of 203.33 tons per year. The facility has requested to limit the emissions of VOC to 22.0 tons per rolling, 12-month period to avoid triggering major nonattainment new source review (NSR). The facility will employ capture and control equipment with a minimum control efficiency of 95%, by weight and a minimum capture efficiency of 90%, by weight for VOCs and will maintain records of the VOC emissions to ensure compliance with the VOC emission limitation. The facility has also requested to maintain the facility-wide emission caps on any individual HAP and total combined HAPs to below Title V thresholds by including emissions unit K021 in the record keeping requirements for HAPs.

D. Conclusion

Pechiney Plastic Packaging, Inc. has committed to employ capture and control equipment and to maintain records of the coating and solvent usage to demonstrate that the VOC emissions are maintained below the level that triggers major nonattainment NSR. Pechiney Plastic Packaging, Inc. has also committed to maintaining the facility-wide emissions for any individual HAP and total combined HAPs to below Title V thresholds to avoid being subject to 40 CFR Part 63, subpart KK.

State of Ohio Environmental Protection Agency

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

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 16-02495
Fac ID: 1677000105

DATE: 6/19/2007

Pechiney Plastic Packaging Inc
Casimir Rogala
1972 Akron-Peninsula Rd
Akron, OH 44313

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **ARAQMD** **AKRON METRO AREA TRANS STUDY** **PA** **WV**

SUMMIT COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **16-02495** FOR AN AIR CONTAMINANT SOURCE
FOR **Pechiney Plastic Packaging Inc**

On 6/19/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Pechiney Plastic Packaging Inc**, located at **1972 Akron-Peninsula Rd, Akron**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02495:

Flexographic Press, Vision 2.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]

Permit To Install **Issue Date: To be entered upon final issuance**
Terms and Conditions **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 16-02495

Application Number:	16-02495
Facility ID:	1677000105
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Pechiney Plastic Packaging Inc
Person to Contact:	Casimir Rogala
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):
Flexographic Press, Vision 2.

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

Chris Korleski
Director

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 (i.e., postmarked) quarterly, 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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 re-issuance, or modification

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, 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 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> 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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Pechiney Plastic Packaging Inc **Facility ID: 1677000105**
PTI Application: 16-02495
Issued: To be entered upon final issuance

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

Pollutant	Tons Per Year
VOC	22.0 tons per rolling, 12-month period
Individual HAP	9.9 tons per rolling, 12-month period for the entire facility
Combined HAPs	24.9 tons per rolling, 12-month period for the entire facility

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

1. Pechiney Plastic Packaging, Inc. 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 compounds (VOC) to 358.9 tons per rolling, 12-month period. The permittee proposed these emission limits to avoid PSD permitting and the Printing and Publishing MACT, 40 CFR Part 63, subpart KK. Pechiney Plastic Packaging, Inc., has accepted the VOC emission limit as a cap on VOC emissions from emissions units K003, K006, K008, K010, K013, K016, K018, K020, T001, T002, and T003, combined. Pechiney Plastic Packaging, Inc., has accepted the individual HAP and total combined HAPs emission limits as a facility-wide caps on emissions from emissions units K003, K006, K008, K010, K013, K016, K018, K020, K021, T001, T002, and T003, combined.

2. In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for emissions units K003, K006, K008, K010, K013, K016, K018, K020, K021, T001, T002, and T003, combined:

   a. For emissions units without control equipment (K018), the permittee shall collect and record the following information:

      i. the name and identification of each coating;

      ii. the VOC content of each coating, in weight percent;

      iii. the individual HAP content for each HAP of each coating, in weight percent;

      iv. the total pounds of each coating employed;

      v. the name and identification of each solvent* employed;

      vi. the VOC content of each solvent, in weight percent;

      vii. the individual HAP content for each HAP of each solvent, in weight percent;

viii. the total pounds of each solvent employed;

ix. the total uncontrolled individual HAP emissions for each HAP for all coatings and solvents employed, in tons per month (for each HAP, the sum of section 2.a.iii divided by 100 times section 2.a.iv for each coating plus the sum of section 2.a.vii divided by 100 times section 2.a.viii for each solvent, divided by 2000);

x. the uncontrolled total combined HAPs emissions for all coatings and solvents employed, in tons per month (the sum of the individual HAP emissions in section 2.a.ix); and

xi. the total uncontrolled VOC emissions for all coatings and solvents employed, in tons per month (the sum of section 2.a.ii divided by 100 times section 2.a.iv for each coating plus the sum of section 2.a.vi divided by 100 times section 2.a.viii for each solvent, divided by 2000).

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

b. For emissions units with control equipment (K003, K006, K008, K010, K013, K016, K020, and K021), the permittee shall collect and record the following information:

i. the name and identification of each coating;

ii. the VOC content of each coating in weight percent;

iii. the individual HAP content for each HAP of each coating, in weight percent;

iv. the total pounds of each coating employed;

v. the name and identification of each solvent* employed;

vi. the VOC content of each solvent, in weight percent;

vii. the individual HAP content for each HAP of each solvent, in weight percent;

viii. the total pounds of each solvent employed;

ix. the total uncontrolled individual HAP emissions for each HAP for all the coatings and solvents employed, in tons per month (for each HAP, the sum of section 2.b.iii divided by 100 times section 2.b.iv for each coating plus the sum of section 2.b.vii divided by 100 times section 2.b.viii for each solvent, divided by 2000);

x. the uncontrolled total combined HAPs emissions for all the coatings and solvents employed, in tons per month (the sum of the individual HAP emissions in section 2.b.ix);

xi. the total uncontrolled VOC accounted for in all coatings and solvents employed, in tons per month (the sum of section 2.b.ii divided by 100 times section 2.b.iv for each coating plus the sum of section 2.b.vi divided by 100 times section 2.b.viii for each solvent, divided by 2000);

xii. the total number of coating waste drums;

xiii. the total amount of VOC accounted for in the coating waste drums, in tons per month;

xiv. the total uncontrolled VOC emissions, in tons per month (section 2.b.xi minus section 2.b.xiii);

xv. the linear feet of material produced by each emissions unit;

xvi. the total linear feet of material produced by all of emissions units that employ control equipment;

xvii. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate the total uncontrolled individual HAP emissions for each HAP for each emissions unit, in tons per month (for each emissions unit section 2.b.xv divided by section 2.b.xvi and then multiplied by section 2.b.ix);

xviii. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate the uncontrolled total combined HAPs emissions for each emissions unit, in tons per month (for each emissions unit section 2.b.xv divided by section 2.b.xvi and then multiplied by section 2.b.x);

xix. the total uncontrolled VOC emissions for each emissions unit, in tons per month (for each emissions unit section 2.b.xv divided by section 2.b.xvi and then multiplied by section 2.b.xiv);

xx. if the uncontrolled individual HAP emission rate for any HAP is calculated

to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate for each emissions unit the controlled individual HAP emission rate for all coatings and solvents, in 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);

xxi. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate for each emissions unit the controlled total combined HAPs emission rate for all coatings and solvents, in 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);

xxii. for each emissions unit, the calculated, controlled VOC emission rate for all coatings and solvents, in 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. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate the total controlled individual HAP emission rate for all the emissions units (sum all the calculated, controlled individual HAP emission rate for each emissions unit from section 2.b.xx);

xxiv. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate the controlled total combined HAPs emission rate for all the emissions units (sum all the calculated, controlled total combined HAPs emission rate for each emissions unit from section 2.b.xxi); and

xxv. the total calculated, controlled VOC emission rate for all the emissions units** (sum all the calculated, controlled VOC emission rate for each emissions unit from section 2.b.xxii).

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

**Emissions unit K021 is not included in this calculation.

c. For emissions units with control equipment but vent complying coatings to atmosphere (K010, K020, and K021), the permittee shall collect and record the following information for the coatings that are vented to atmosphere for each emissions unit individually:

i. the name and identification of each coating;

ii. the VOC content of each coating, in weight percent;

iii. the individual HAP content for each HAP of each coating, in weight percent;

iv. the total pounds of each coating employed;

v. the name and identification of each solvent* employed;

vi. the VOC content of each solvent, in weight percent;

vii. the individual HAP content for each HAP of each solvent, in weight percent;

viii. the total pounds of each solvent employed;

ix. the total uncontrolled individual HAP emissions for each HAP for all coatings and solvents employed, in tons per month (for each HAP, the sum of section 2.c.iii divided by 100 times section 2.c.iv for each coating plus the sum of section 2.c.vii divided by 100 times section 2.c.viii for each solvent, divided by 2000);

x. the uncontrolled total combined HAPs emissions for all coatings and solvents employed, in tons per month (the sum of the individual HAP emissions in section 2.c.ix);

xi. the total uncontrolled VOC emissions for all coatings and solvents employed, in tons per month (the sum of section 2.c.ii divided by 100 times section 2.c.iv for each coating plus the sum of section 2.c.vi divided by 100 times section 2.x.viii for each solvent, divided by 2000);

xii. the total calculated, uncontrolled individual HAP emission rate for each HAP for all the emissions units;

xiii. the total calculated, uncontrolled total combined HAPs emission rate for all the emissions units; and

xiv. the total calculated, uncontrolled VOC emission rate for all the emissions units**.

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

**Emissions unit K021 is not included in this calculation.

d. For total facility emissions, the permittee shall collect and record the following information:

i. the total uncontrolled individual HAP emissions for each HAP for the entire facility, in tons per month (section 2.a.ix plus section 2.b.ix plus section 2.c.xii plus A/12);

ii. the total uncontrolled combined HAPs emissions for the entire facility, in tons per month (section 2.a.x plus section 2.b.x plus section 2.c.xiii plus B/12);

iii. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall calculate the controlled total individual HAP emissions for the entire facility, in tons per month (section 2.a.ix plus section 2.b.xxiii plus section 2.c.xii plus C/12);

iv. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall calculate the controlled total combined HAPs emissions for the entire facility, in tons per month (section 2.a.x plus section 2.b.xxiv plus section 2.c.xiii plus D/12);

v. the total VOC emissions for the entire facility*, in tons per month (section 2.a.xi plus section 2.b.xxv plus section 2.c.xiv plus 0.25 ton per month** plus E/12);

vi. the permittee shall record the rolling, 12-month summation of the monthly uncontrolled emissions of each individual HAP for the entire facility for each calendar month;

vii. the permittee shall record the rolling, 12-month summation of the monthly uncontrolled emissions of total combined HAPs for the entire facility for each calendar month;

viii. the permittee shall record the rolling, 12-month summation of the monthly emissions of VOC for the entire facility for each calendar month;

ix. if the uncontrolled individual HAP emission rate for any HAP is calculated to be greater than 9.9 tons per rolling, 12-month period, then the permittee shall record the rolling, 12-month summation of the monthly

controlled emissions of each individual HAP for the entire facility for each calendar month; and

x. if the uncontrolled total combined HAPs emission rate is calculated to be greater than 24.9 tons per rolling, 12-month period, then the permittee shall record the rolling, 12-month summation of the monthly controlled emissions of total combined HAPs for the entire facility for each calendar month.

A=the uncontrolled potential to emit for individual HAP emissions from the natural gas combustion from the incinerator (oxidizer) and ovens from all the emissions units.

B=the uncontrolled potential to emit for total combined HAPs emissions from the natural gas combustion from the incinerator (oxidizer) and ovens from all the emissions units.

C=the controlled potential to emit for individual HAP emissions from the natural gas combustion from the incinerator (oxidizer) and ovens for all the emissions units.

D=the controlled potential to emit for total combined HAPs emissions from the natural gas combustion from the incinerator (oxidizer) and ovens for all the emissions units.

E=The controlled VOC emissions from the natural gas combustion from the incinerator (oxidizer) and ovens for emissions units K003, K006, K008, K010, K013, K016, K018, and K020.

*Emissions unit K021 is not included in this calculation.

**The potential to emit for VOC for the three storage tanks is 3.0 tons per year (0.25 ton per month). The storage tanks do not store any HAP.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP, and total combined HAPs. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition (A)(1)(c).

4. 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 each emissions unit, the VOC emission rate, in tons per year.

The annual reports shall be submitted by January 31 of each year, and shall cover the records for the previous calendar year (January through December). This reporting requirement may be satisfied by including and identifying the specific emission data (VOC, individual HAPs, and combined HAPs) for each emissions unit in the facility's annual Fee Emission Report.

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

Emission Limitations:

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitations above in accordance with the record keeping requirements established in Part II, sections A.2.a, A.2.b, A.2.c, and A.2.d of this permit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings and inks. Formulation data shall be used to determine the HAP contents of the coatings and solvents.

6. The terms and conditions in Part II - Specific Facility Terms and Conditions in this permit to install 16-02495 shall supercede the terms and conditions in Part II - Specific Facility Terms and Conditions in permit to install 16-02184.

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

None

Emissions Unit ID: K021

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.

Operations, Property, and/or Equipment - (K021) - 8 color 29 inch flexographic printing press with in line adhesive station and single color in line flexo station - Vision 2.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	16.22 pounds of volatile organic compounds (VOC) per hour (See A.I.2.a below.) When venting the VOC emissions from the in line adhesive station to the atmosphere, the VOC content of the coatings and inks shall not exceed the following: i. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or ii. twenty-five percent VOC by volume of the volatile matter in the coating and ink. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) (synthetic minor to avoid nonattainment NSR)	The printing line shall be equipped with a capture system and associated control system which are designed and operated to achieve a control efficiency which is at least 95 percent, by weight, and a capture efficiency which is at least 90 percent, by weight, for VOC. The annual VOC emissions shall not exceed 22.0 tons of VOC per rolling, 12-month summation (See A.2.b below).
OAC rule 3745-21-09(Y)(1)(a)	The emission limitations specified by this rule are equivalent to the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(Y)(1)(b)	The emission control requirements based on this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(C).

Emissions Unit ID: K021

ORC 3704.03(T)(4)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled nitrogen oxides (NOx), particulate emissions (PE), carbon monoxide (CO) and sulfur dioxide (SO2) emissions from this air contaminant source since the potential to emit for NOx, PE, CO and SO2 is less than ten tons per year.

2. Additional Terms and Conditions

2.a The hourly VOC 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 limitation.

2.b The emissions of VOC from this emissions unit shall not exceed 22.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

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

Month(s)	Maximum Allowable Cumulative Emissions of VOC (tons)
1	1.8
1-2	3.7
1-3	5.5
1-4	7.3
1-5	9.2
1-6	11.0
1-7	12.8
1-8	14.7
1-9	16.5
1-10	18.3
1-11	20.2
1-12	22.0

After the first 12 calendar months of operation, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

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II. Operational Restrictions

1. The VOC emissions from the 8-color flexographic printing press and the single color in line backside flexo station shall be vented to the catalytic incinerator when the emissions unit is in operation.

2. When employing a coating on the in line adhesive station that meets the requirements of term and condition A.I.1 above, the VOC emissions from the in line adhesive station may be vented to the atmosphere.

3. When employing a coating on the in line adhesive station that does not meet the requirements of term and condition A.I.1 above, the VOC emissions shall be vented the catalytic incinerator.

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 emissions unit were not vented to the catalytic incinerator except for time periods when the emissions from the in line adhesive station are vented to the atmosphere as allowed by term and condition A.I.1 and the emissions from the 8-color flexographic printing press and the single color in line backside flexo station are vented to the catalytic incinerator.

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the temperature immediately upstream and downstream of the incinerator's catalyst bed during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall collect and record the following information for each day when the catalytic incinerator is in use:

   a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

   b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance. The permittee may

use the incinerator's temperature chart to determine the temperature differential across the catalyst bed.

c. A log of operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit. The permittee may use the current temperature chart as the log documenting that the monitoring equipment and control device are operating. Bypass of the collection system by the emissions unit shall be logged as to the date and time.

Whenever the monitored values for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, deviate from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

An acceptable value for the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, can not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emission test that demonstrated the emissions unit was in compliance.

3. The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The VOC conversion efficiency of the catalyst in the catalytic incinerator, as determined by the catalyst activity testing, shall be at least 95% at a test temperature that is representative of the normal temperature at the catalyst bed inlet. Solvent loading during the catalyst analysis shall be consistent with the test laboratory's normal testing protocol.

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4. This emissions unit shall be operated with an interlock system that prevents the operation of this emissions unit when materials not meeting the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii) are utilized and the catalytic incinerator is not in operation.

5. All ventilation fans associated with this emissions unit and the catalytic incinerator shall be in operation at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii).

6. All bypass dampers, actuator pins, and associated motors shall be in the correct position and in good operating condition at all times when this emissions unit is in operation and utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii), to ensure that all captured VOC emissions are vented to the catalytic incinerator. Also, all the hooding and ductwork comprising the VOC emission capture system for this emissions unit shall be free of leaks and holes that would permit the escape of the captured VOC emissions.

7. The permittee shall perform an inspection of the catalytic incinerator, including the catalyst bed, on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, as specified in the document entitled "Recommended Annual Inspection Points and Procedures" as submitted to the Ohio EPA on February 26, 2002, and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing schedule in section A.V.5, a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in section A.V.5. The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator.

8. The permittee shall maintain a record of the results of each annual and weekly inspection of the catalytic incinerator, as well as the results of each catalyst activity test required in section A.V.5.

9. On an annual basis, the permittee shall inspect the electronics of the interlock system used for this emissions unit to verify the signals between the catalytic incinerator and the emissions unit are functioning properly. The permittee shall document the results of all annual inspections. An excursion is defined as a finding that the interlock is inoperative. Any excursion shall require that the process line be immediately shut

down and remain shut down until the problem has been corrected.

10. The permittee shall utilize an anemometer, or any other equivalent measurement method approved by the Ohio EPA, to measure the total exhaust flow rate from this emissions unit at the outlet of this emissions unit with a minimum frequency of once per calendar quarter, while this emissions unit is in operation. The anemometer, or other equivalent measurement method approved by the Ohio EPA, shall be capable of accurately measuring the desired parameter and shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. Units shall be in standard cubic feet per minute. The velocity measuring device shall be capable of accurately measuring the desired parameter.

    Whenever the monitored value for the air flow rate at the outlet of this emissions unit deviates from the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

    In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the capture (collection) system within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time, immediately after the corrective action, the total exhaust flow rate from this emissions unit, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

    An acceptable value for the air flow rate at the outlet of this emissions unit when the emissions unit is in operation can be no less than the average air flow rate measured/documented during the most recent emission test that demonstrated the emissions unit was in compliance.

11. Each calendar month, the permittee shall inspect the operational condition and integrity of each ventilation fan comprising the capture system. Ventilation fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

12. Each calendar month, the permittee shall inspect the operational condition and integrity of all hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the catalytic incinerator or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly. The permittee shall document the results of all monthly inspections, including any corrective actions taken.

13. The permittee shall collect and record the following information each month for the coatings employed on the in line adhesive station that are vented to the atmosphere:

    a. the name and identification number of each coating and ink, as applied; and

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

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

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

14. If a job specification calls for a coating to be employed on the in line adhesive station that does not comply with the requirements of term and condition A.I.1, then the permittee shall maintain the following information in a log:

    a. the date;

    b. confirmation that the VOC emissions from the noncomplying coatings were diverted to the catalytic incinerator; and

    c. the personnel initials.

15. The permittee shall maintain monthly records of the following information:

    a. the calculated, controlled VOC emission rate, in tons per month (A.2.b.xxii plus A.2.c.xi of Part II - Specific Facility Terms and Conditions plus 0.01/12*);

    b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the emissions of VOC.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative VOC emissions for each calendar month.

*The controlled VOC emissions from the natural gas combustion from the ovens.

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 emissions unit were not vented to the catalytic incinerator except for time periods when the emissions from the in line adhesive station are vented to the atmosphere as allowed by term and condition A.I.1 and the emissions from the 8-color flexographic printing press and the single color in line backside flexo station are vented to the catalytic incinerator. Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

   a. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed (as determined by the continuous temperature monitor) was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance when the emissions unit is in operation;

   b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance;

   c. a summary of the operating time for the capture (collection) system, control device, monitoring equipment, and the emissions unit;

   d. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

   e. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the average temperature of the exhaust gases immediately before the catalyst bed into compliance with the acceptable value, was determined to be necessary and was not taken; and

f. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

NOTE: A temperature difference across the catalyst bed that was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance is not necessarily indicative of a violation of the control efficiency limitation for VOC.

3. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.5. These reports shall be submitted within 45 days after each catalyst activity test is performed.

4. The permittee shall submit quarterly deviation (excursion) reports that identify the following events when this emissions unit is utilizing materials that do not meet the VOC content limitations specified in OAC rule 3745-21-09(Y)(1)(a)(i) or (ii):

   a. each time the interlock system does not stop the operation of this emissions unit when the catalytic incinerator is not in operation; and

   b. each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions.

5. The permittee shall submit annual reports that specify the results of each annual inspection of the electronics of the ventilation fan interlock systems and the catalytic incinerator interlock system, based on the records maintained pursuant to section A.III.9 of these terms and conditions. These reports shall be submitted within 45 days after each inspection is performed.

6. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the integrity of any ventilation fan has comprised the capture system. These reports shall include information required by 40 CFR Part 64.9(a).

7. The permittee shall submit quarterly deviation (excursion) reports that identify the findings of any inspection that determined the external structural integrity of the catalytic incinerator has been jeopardized and it no longer operates as designed. These reports shall include information required by 40 CFR Part 64.9(a).

8. The permittee shall submit annual reports that summarize the results of each annual

inspection of the internal integrity of the catalytic incinerator, based on records maintained pursuant to section A.III.8 of these terms and conditions. These reports shall be submitted within 45 days after each inspection is performed.

9. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

10. The permittee shall submit quarterly reports that identify the following information concerning the operation of the capture (collection) system during the operation of this emissions unit:

    a. each period of time when the air flow rate at the outlet of this emissions unit was less than the acceptable value;

    b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;

    c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the air flow rate into compliance with the acceptable value, was determined to be necessary and was not taken; and

    d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

    These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

11. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions, Section A of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

Emissions Unit ID: K021

a. The emission testing shall be conducted within 180 days of startup of this emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the 90 percent, by weight, capture efficiency limitation for VOC. (Control efficiency testing to demonstrate compliance with the applicable 95 percent efficiency limitation was performed on September 6, 2006.)

c. The test method(s) which must be employed to demonstrate compliance with the capture and control efficiency limitations for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

f. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

g. During each capture efficiency test run, the permittee shall measure the total exhaust flow rate from the outlet of this emissions unit, in scfm.

h. During each control efficiency test run, the permittee shall measure the following:

   i. the temperature of the exhaust gases immediately before the catalyst bed, in degrees F; and

   ii. the temperature difference across the catalyst bed, in degrees F.

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. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in section A.III.7. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

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

   a. Emission Limitation:

      16.22 pounds of VOC per hour

      Applicable Compliance Method:

      Compliance with the hourly allowable VOC emission limitation shall be determined by multiplying the maximum line speed in feet per minute by 60 minutes per hour times the maximum print/coat width in feet times the maximum pounds of VOC per ream times one ream per 3000 square feet times (1 - (0.855)*). If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

      *Overall control efficiency is based on the capture efficiency requirement of 90%, by weight and the control efficiency requirement of 95%, by weight.

b. Emission Limitation:

The annual VOC emissions shall not exceed 22.0 tons of VOC per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be determined based upon the records required pursuant to Part II - Specific Facility Terms and Conditions and section A.III.15.

c. Emission Limitation:

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

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

d. Emission Limitation:

A control efficiency which is at least 95 percent, by weight, for VOC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the results of emission testing conducted in accordance with the procedures as outlined in section A.V.1 of this permit.

e. Emission Limitation:

Emissions Unit ID: K021

A capture efficiency which is at least 90 percent, by weight, for VOC.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the results of emission testing conducted in accordance with the procedures as outlined in section A.V.1 of this permit.

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K021) - 8 color 29 inch flexographic printing press with in line adhesive station and single color in line flexo station - Vision 2.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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 pollutant listed in OAC rule 3745-114-01 will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install

Issued: To be entered upon final issuance

prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the

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emissions of any pollutant listed in OAC rule 3745-114-01 that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

Emissions Unit ID: K021

NEW SOURCE REVIEW FORM B

PTI Number: 16-02495 Facility ID: 1677000105

FACILITY NAME Pechiney Plastic Packaging Inc

FACILITY DESCRIPTION Flexographic Press, Vision 2. CITY/TWP Akron

SIC CODE 2671 SCC CODE 4-05-003-11 EMISSIONS UNIT ID K021

EMISSIONS UNIT DESCRIPTION 8 color 29 inch flexographic printing press with in line adhesive station and single color in line flexo station - Vision 2.

DATE INSTALLED not begun

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Volatile Organic Compounds			22.0	16.22 lbs/hr	22.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

90% capture efficiency and 95% control efficiency for VOC emissions by weight, application

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES NO

IDENTIFY THE AIR CONTAMINANTS: