



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

5/18/2016

Certified Mail

Vickie Winters  
International Paper Food Service  
1300 S MAIN ST  
KENTON, OH 43326

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0333010035  
Permit Number: P0120649  
Permit Type: Renewal  
County: Hardin

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-NWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
International Paper Food Service**

Facility ID:	0333010035
Permit Number:	P0120649
Permit Type:	Renewal
Issued:	5/18/2016
Effective:	5/18/2016
Expiration:	5/18/2021





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
International Paper Food Service

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**Final Permit-to-Install and Operate**  
International Paper Food Service  
**Permit Number:** P0120649  
**Facility ID:** 0333010035  
**Effective Date:** 5/18/2016

## Authorization

Facility ID: 0333010035  
Application Number(s): A0053303  
Permit Number: P0120649  
Permit Description: Renewal FEPTIO for three flexographic printing presses.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 5/18/2016  
Effective Date: 5/18/2016  
Expiration Date: 5/18/2021  
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

International Paper Food Service  
1300 South Main Street  
Kenton, OH 43326

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0120649

Permit Description: Renewal FEPTIO for three flexographic printing presses.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Group Name: Presses: K003, K005, K007**

<b>Emissions Unit ID:</b>	<b>K003</b>
Company Equipment ID:	Webtron Flexographic Printing Press
Superseded Permit Number:	P0106238
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K005</b>
Company Equipment ID:	K005
Superseded Permit Number:	P0106238
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K007</b>
Company Equipment ID:	Flexographic Press
Superseded Permit Number:	P0106238
General Permit Category andType:	Not Applicable



**Final Permit-to-Install and Operate**  
International Paper Food Service  
**Permit Number:** P0120649  
**Facility ID:** 0333010035  
**Effective Date:** 5/18/2016

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
International Paper Food Service  
**Permit Number:** P0120649  
**Facility ID:** 0333010035  
**Effective Date:** 5/18/2016

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
International Paper Food Service  
**Permit Number:** P0120649  
**Facility ID:** 0333010035  
**Effective Date:** 5/18/2016

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group -Presses: K003, K005, K007**

EU ID	Operations, Property and/or Equipment Description
K003	Webtron Flexographic Printing Press
K005	Comco Flexographic Printing Press with Electric Drying Oven
K007	Flexographic Printing Press

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)e., d)(2), d)(3), e)(3), f)(1)b., and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	<u>Emissions Unit K003</u> 1855.00 lbs of volatile organic compounds (VOC)* /month  <u>Emissions Unit K005</u> 4045.00 lbs of VOC* /month  <u>Emissions Unit K007</u> 3957.00 lbs of VOC* /month  See b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(D)	Emissions of VOC shall not exceed 83.94 tons per rolling, 12-month period, from the printing and cleanup operations* associated with emissions units K003, K005 and K007 combined (see b)(2)e.)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Emissions of combined hazardous air pollutants (HAPs) shall not exceed 9.38 tons per rolling, 12-month period, from the printing and cleanup operations* associated with emissions units K003, K005 and K007 combined (see b)(2)e.)
c.	OAC rule 3745-21-09(Y)(1)(a)	See b)(2)a.
d.	ORC 3704.03(F) OAC rule 3745-114-01	See d)(5).

\* Including inks, pH additives, defoamers, print clean, ammonia reducer, alcohol, cleanup solvents, etc.

(2) Additional Terms and Conditions

- a. The VOC content of coatings and inks employed shall not exceed the following limitation:
  - 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.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a).
- c. Best Available Technology (BAT) control requirements for each emissions unit has been determined to be use of compliant coatings and inks.
- d. Combustion emissions generated from the natural gas-fired drying ovens associated with emissions units K003 and K007 are negligible and not included in this permit. Therefore, these emissions units are not subject to the requirements of OAC rule 3745-31-05(A)(3), as effective 11/30/01 and 12/01/06. (Note: the oven associated with emissions unit K005 is electric.)
- e. This permit establishes federally enforceable limitations for emissions of VOC and for emissions of combined HAPs for the purpose of providing regulatory certainty regarding the facility's potential to emit.

Combined annual VOC emissions from emissions units K003, K005 and K007 shall not exceed 83.94 tons per rolling 12-month period.

Combined annual HAPs emissions from emissions units K003, K005 and K007 shall not exceed 9.38 tons per rolling 12-month period. For purposes of federal enforceability, an emission restriction on combined HAPs effectively limits emissions of individual HAPs since emissions from combined HAPs are less than 10 tons per year.

Emissions units K003, K005 and K007 have been in operation for more than 12 months and, such, the facility has existing usage and VOC emissions records for these operations in lieu of establishing monthly restrictions for the first year of operation.

- c) Operational Restrictions
  - (1) None
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each month for emissions units K003, K005 and K007:
    - a. The name and identification of each VOC-containing material employed (i.e., ink, pH additives, defoamers, print clean, ammonia reducer, alcohol, cleanup solvents, etc.);
    - b. The VOC content of each VOC-containing material, in pounds per gallon, as applied;
    - c. The number of gallons of each VOC-containing material employed;
    - d. The total VOC emissions from each VOC-containing material employed, in pounds (summation of d)(1)b. x d)(1)c.);
    - e. The total VOC emissions from all VOC-containing materials employed, in pounds (summation of d)(1)d.);
    - f. The product per press allocation factor for each individual press as determined by Ohio EPA's Engineering Guide #68; and
    - g. The VOC emission rate for each individual press, in lbs/month [d)(1)e. x d)(1)f.]
  - (2) The permittee shall collect and record the following information each month for emissions units K003, K005 and K007 combined:
    - a. The rolling 12-month VOC emissions, in tons.
  - (3) The permittee shall collect and record the following information each month for emissions units K003, K005 and K007 combined:
    - a. The name and identification of each HAP-containing printing and cleanup material employed (i.e., ink, pH additives, defoamers, print clean, ammonia reducer, alcohol, cleanup solvents, etc.);
    - b. The amount of HAP in each printing and cleanup material, in pounds per gallon, as applied;
    - c. The number of gallons of each printing and cleanup material employed;

- d. The total HAP emissions from each printing and cleanup material employed, in pounds (summation of d)(3)b. x d)(3)c.);
  - e. The total HAP emission rate from all printing and cleanup materials employed, in pounds (summation of d)(3)d.); and
  - f. The rolling 12-month HAP emissions, in tons.
- (4) The permittee shall collect and record the following information each month for purposes of demonstrating compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a):
- a. When complying with the VOC emission limitation specified in b)(2)a.i., the permittee shall collect and record the VOC content of each coating and ink in percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied\* [calculated as in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,5}$ ];
  - b. When complying with the VOC emission limitation specified in b)(2)a.ii., the permittee shall collect and record the VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, as applied\* [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,6}$ ]
- \*When the permittee employs a blend or mixture of compliant coatings, inks, additives, reducer, etc. [i.e. each individual coating, ink, additive, reducer, etc., used to make up the "as applied" material, complies with the appropriate VOC emission limitation in b)(2)a.i. or b)(2)a.ii.], the permittee may apply the recordkeeping requirements of this term and condition to the individual components of blend or mixture in lieu of the blend or mixture on an "as applied" basis.
- (5) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncompliant coatings and/or inks. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. the rolling 12-month VOC limitation of 83.76 tons; and
    - ii. the rolling 12-month combined HAP limitation of 9.38 tons.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted electronically through Ohio EPA Air Services each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Northwest District Office).

- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

K003: 1855.00 lbs of VOC/month  
K005: 4045.00 lbs of VOC/month  
K007: 3957.00 lbs of VOC/month

Applicable Compliance Method:

Compliance with the monthly limitations shall be based upon the record keeping requirements in section d)(1).

b. Emission Limitation:

Emissions of VOC shall not exceed 83.94 tons per rolling 12-month period from printing and cleanup operations associated with emissions units K003, K005, and K007

Applicable Compliance Method:

Compliance with the monthly and annual limitations shall be based upon the record keeping requirements in section d)(2).

c. Emission Limitation:

Emissions of combined HAPs shall not exceed 9.38 tons per rolling 12-month period from printing and cleanup operations associated with emissions units K003, K005 and K007

Applicable Compliance Method:

Compliance with the monthly and annual limitations shall be based upon the recordkeeping requirements in section d)(3).

d. Emission Limitation:

VOC content of each coating and ink shall not exceed:

- 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.



**Final Permit-to-Install and Operate**  
International Paper Food Service  
**Permit Number:** P0120649  
**Facility ID:** 0333010035  
**Effective Date:** 5/18/2016

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(4). Formulation data or U.S. EPA Method 24A shall be used to determine the VOC contents of the coatings and inks.

- g) Miscellaneous Requirements
  - (1) None.