



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 16-02350**

**DATE: 7/22/2004**

Georgia Pacific Corp  
Steve Kuhlman  
951 County St  
Milan, MI 48160

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

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

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

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

Sincerely,

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

cc: USEPA

ARAQMD



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**Permit To Install  
Terms and Conditions**

**Issue Date: 7/22/2004  
Effective Date: 7/22/2004**

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**FINAL PERMIT TO INSTALL 16-02350**

Application Number: 16-02350  
APS Premise Number: 1677150028  
Permit Fee: **\$200**  
Name of Facility: Georgia Pacific Corp  
Person to Contact: Steve Kuhlman  
Address: 951 County St  
Milan, MI 48160

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**3265 Gilchrist Rd  
Mogadore, Ohio**

Description of proposed emissions unit(s):  
**Diecutter with Two Color Printing Capabilities.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

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.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

**6. 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.

**7. 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.

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. 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.

**11. Applicability**

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

**12. 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.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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 PTI Application: 16-02350  
 Issued: 7/22/2004

Facility ID: 1677150028

#### 14. Construction Compliance Certification

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

#### 15. Fees

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

### B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year (facility)</u>
VOCs	52.0
Individual HAPs	9.0
combined HAPs	22.2

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>K011 (90" x 220" Bendazolli Press) sheet-fed, 2-color flexographic printing line with die cutter to print and cut corrugated boxboard sheets to make shipping containers; water used as cleanup; air emissions of volatile organic compounds (VOCs) uncontrolled and fugitive; application includes facility-requested federally enforceable Title V Synthetic Minor (TVSM) material usage restrictions to limit facility potential emissions of VOCs and hazardous air pollutants (HAPs) below applicable Title V emissions thresholds.</p> <p>Note: this facility includes a total of ten emissions units (with the addition of K011): K001 through K003, K006 through K011, &amp; P001.</p>	<p>OAC rule 3745-31-05(A)(3)</p> <p>OAC rule 3745-21-09(Y)</p> <p>OAC rule 3745-35-07(B)</p>	<p>5.16 lbs/hr &amp; 22.6 tpy VOCs</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y), OAC rule 3745-35-07(B), and Sections A.2 and B.1 through B.4 below.</p> <p>See Part II, Section A.2.b below.</p> <p>The following annual facility emissions limitations for K001 through K003, K006 through K011, &amp; P001 are based upon a rolling, 12-month summation of the monthly emissions per the restricted federally enforceable material usage limitations of Part II, Section B:</p> <p>52.0 tpy VOCs;                      9.0 tpy individual HAPs; and                      22.2 tpy combined HAPs.</p> <p>The permittee has existing facility emissions records such that there is no need for first year cumulative monthly emissions limitations.</p>

## 2. Additional Terms and Conditions

- 2.a** The VOC emissions limitations regulated per OAC rule 3745-31-05(A)(3) are based upon accepted USEPA potential to emit procedures for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with these emissions limits.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increase(s) the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

- 2.b** Per OAC rule 3745-21-09(Y)(1), the VOC content of the coatings and inks employed in this printing line shall not exceed the following limitation:

Forty per cent VOC by volume of each coating and ink, excluding water and exempt solvents; or

Twenty-five per cent VOC by volume of the volatile matter in each coating and ink.

Per OAC rule 3745-21-09(Y)(2), K011 is exempt from the requirements of OAC rule 3745-21-09(Y)(1) if the total maximum usage of coatings and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines at this facility is less than or equal to one hundred forty-eight tons per year.

- 2.c** The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the ten sources in this permit shall not exceed 9.0 tons/year for any single HAP and 22.2 tons/year for any combination of HAPs. VOC emissions for the ten emissions units in this permit are restricted to 52.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation of the monthly emissions.
- 2.d** As a way to reduce VOC emissions, all inks, coatings, adhesives, cleanup solvents/rags, and all other organic solvent containing materials shall be properly identified and held in tightly closed containers at all times when not in use or waiting for appropriate off-site disposal.

## B. Operational Restrictions

1. The permittee shall use only water as cleanup for K011. No organic cleanup solvent shall be used.
2. The maximum annual VOC material usage\* (from inks, coatings, adhesive, and clean up materials) for K001 through K003, K006 through K011, & P001 shall not exceed 52.0 tons, based upon a rolling, 12-month summation of the VOC material usage figures.

\*Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon the solvent in the materials employed or applied being emitted.

[Note: The permittee has existing facility VOC material usage records such that there is no need for first year cumulative monthly VOC material usage restrictions.]

3. The maximum annual individual HAP material usage\*\* (from inks, coatings, adhesive, and clean up materials) for K001 through K003, K006 through K011, & P001 shall not exceed 9.0 tons, based upon a rolling, 12-month summation of the individual HAP material usage figures.

\*\*Annual individual HAP material usage rate (input) is equivalent to an annual individual HAP emissions rate, and is based upon the solvent in the materials employed or applied being emitted.

[Note: The permittee has existing facility individual HAP material usage records such that there is no need for first year cumulative monthly individual HAP material usage restrictions.]

4. The maximum annual combined HAP material usage rate\*\*\* (from inks, coatings, and adhesive, and clean up materials) for K001 through K003, K006 through K011, & P001 shall not exceed 22.2 tons, based upon a rolling, 12-month summation of the combined HAP material usage figures.

\*\*\*Annual combined HAP material usage rate (input) is equivalent to an annual combined HAP emissions rate, and is based upon the solvent in the materials employed or applied being emitted.

[Note: The permittee has existing facility combined HAP material usage rates such that there is no need for first year cumulative monthly combined HAP material usage restrictions.]

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for K011:
  - a. the name and company identification of each ink and coating employed; and
  - b. the VOC content in percentage VOC by volume of each coating and ink, excluding water and exempt solvents, or the VOC content in percentage VOC by volume of the volatile matter in each coating and ink.

USEPA Methods 24 and 24A, as applicable, shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings. If, pursuant to Methods 24 and 24A, 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.

2. The permittee shall collect and record the total annual usage, in tons/year, of coatings and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines at this facility.
3. The permittee shall collect and record the following information each month for the facility (K001 through K003, K006 through K011, & P001) to determine facility VOC material usage and emissions:
  - a. the name and identification number of each ink, coating, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, as applied;
  - c. the weight, in pounds per month, of each coating, as applied;
  - d. the weight, in pounds per month, of each adhesive, as applied;
  - e. the weight, in pounds per month, of each cleanup material, as applied;
  - f. the VOC content of each ink, as applied, in percent by weight;
  - g. the VOC content of each coating, as applied, in percent by weight;
  - h. the VOC content of each adhesive, as applied, in percent by weight;
  - i. the VOC content of each cleanup material, as applied, in percent by weight
  - j. the total VOC material usage of all inks, as applied, in pounds per month, i.e.,  $j = \text{sum}[b \times f]$  for all inks;
  - k. the total VOC material usage of all coatings, as applied, in pounds per month, i.e.,  $k = \text{sum}[c \times g]$  for all coatings;

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- l. the total VOC material usage of all adhesives, as applied, in pounds per month, i.e.,  $l = \text{sum}[d \times h]$  for all adhesives;
  - m. the total VOC material usage of all cleanup materials, as applied, in pounds per month, i.e.,  $m = \text{sum}[e \times i]$  for all cleanup materials;
  - n. the total VOC material usage of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per month, i.e.,  $n = [j + k + l + m]/2000$ ;
  - o. the total VOC emissions of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per month, i.e.,  $o = n$ , since emissions rate equals usage rate;
  - p. the rolling, 12-month summation of the monthly total VOC material usage rates of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per year; and
  - q. the rolling, 12-month summation of the monthly total VOC emissions rates of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per year, i.e.,  $q = p$ , since emissions rate equals usage rate.
4. The permittee shall collect and record the following information each month for the facility (K001 through K003, K006 through K011, & P001) to determine facility individual HAP material usages and emissions:
- a. the name and identification number of each ink, coating, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, as applied;
  - c. the weight, in pounds per month, of each coating, as applied;
  - d. the weight, in pounds per month, of each adhesive, as applied;
  - e. the weight, in pounds per month, of each cleanup material, as applied;
  - f. the individual HAP content for each HAP of each ink, as applied, in percent by weight;
  - g. the individual HAP content for each HAP of each coating, as applied, in percent by weight;
  - h. the individual HAP content for each HAP of each adhesive, as applied, in percent by weight;
  - i. the individual HAP content for each HAP of each cleanup material, as applied, in percent by weight;

- j. the total individual HAP material usage for each HAP of all inks, as applied, in pounds per month, i.e.,  $j = \text{sum}[b \times f]$  for all inks;
  - k. the total individual HAP material usage for each HAP of all coatings, as applied, in pounds per month, i.e.,  $k = \text{sum}[c \times g]$  for all coatings;
  - l. the total individual HAP material usage for each HAP of all adhesives, as applied, in pounds per month, i.e.,  $l = \text{sum}[d \times h]$  for all adhesives;
  - m. the total individual HAP material usage for each HAP of all cleanup materials, as applied, in pounds per month, i.e.,  $m = \text{sum}[e \times i]$  for all cleanup materials;
  - n. the total individual HAP material usage for each HAP of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per month, i.e.,  $n = [j + k + l + m]/2000$ ;
  - o. the total individual HAP emissions for each HAP of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per month, i.e.,  $o = n$ , since emissions rate equals usage rate;
  - p. the rolling, 12-month summation of the monthly individual HAP material usage rates for each HAP of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per year;
  - q. the rolling, 12-month summation of the monthly individual HAP emissions rates for each HAP of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per year, i.e.,  $q = p$ , since emissions rate equals usage rate.
5. The permittee shall collect and record the following information each month for the facility (K001 through K003, K006 through K011, & P001) to determine facility combined HAP material usage and emissions:
- a. the name and identification number of each ink, coating, adhesive, and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, as applied;
  - c. the weight, in pounds per month, of each coating, as applied;
  - d. the weight, in pounds per month, of each adhesive, as applied;

- e. the weight, in pounds per month, of each cleanup material, as applied;
- f. the combined HAP content of each ink, as applied, in percent by weight;
- g. the combined HAP content of each coating, as applied, in percent by weight;
- h. the combined HAP content of each adhesive, as applied, in percent by weight;
- i. the combined HAP content of each cleanup material, as applied, in percent by weight
- j. the total combined HAP material usage of all inks, as applied, in pounds per month, i.e.,  $j = \text{sum}[b \times f]$  for all inks;
- k. the total combined HAP material usage of all coatings, as applied, in pounds per month, i.e.,  $k = \text{sum}[c \times g]$  for all coatings;
- l. the total combined HAP material usage of all adhesives, as applied, in pounds per month, i.e.,  $l = \text{sum}[d \times h]$  for all adhesives;
- m. the total combined HAP material usage of all cleanup materials, as applied, in pounds per month, i.e.,  $m = \text{sum}[e \times i]$  for all cleanup materials;
- n. the total combined HAP material usage of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per month, i.e.,  $n = [j + k + l + m]/2000$ ;
- o. the total combined HAP emissions of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per month, i.e.,  $o = n$ , since emissions rate equals usage rate;
- p. the rolling, 12-month summation of the monthly total combined HAP material usage rates of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per year; and
- q. the rolling, 12-month summation of the monthly total combined HAP emissions rates of all inks, coatings, adhesives, and cleanup materials, as applied, in tons per year, i.e.,  $q = p$ , since emissions rate equals usage rate.

#### D. Reporting Requirements

1. If K011 is subject to OAC rule 3745-21-09(Y)(1), the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying inks and/or coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month of the occurrence.

**Issued: 7/22/2004**

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the facility annual restricted allowable usage rates for all VOC & HAP materials employed using the methodology specified in Section C above, as well as the corrective actions that were taken to achieve compliance.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the facility 52.0 tpy VOCs, 9.0 tpy individual HAPs, and 22.2 tpy combined HAPs limitations (based upon a rolling, 12-month summation of the monthly emissions), as well as the corrective actions that were taken to achieve compliance.
4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 2 of this permit.

### E. Testing Requirements

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

- a. Emission Limitations: 5.16 lbs/hr & 22.6 tpy VOCs (K011).

Applicable Compliance Method: The above emissions limitations were established based on the unrestricted potential to emit, as shown in the following equations, using company-specified production/process data:

H = PIO; and  
Y = HTW

Where,

H = 5.16 lbs/hr of VOCs [unrestricted hourly potential to emit];  
Y = 22.6 tpy VOCs [unrestricted yearly potential to emit];  
P = 343.75 msf/hr [company-specified maximum production capacity];  
I = 0.15 lb ink/msf [company-specified process factor];  
O = 0.10 lb VOCs/lb ink [maximum ink VOC content];  
T = 8760 hours/year [unrestricted operating schedule]; and  
W = 1 ton/2000 pounds.

- b. Emission Limitation: Forty per cent VOC by volume of each coating and ink, excluding water and exempt solvents; or Twenty-five per cent VOC by volume of the volatile matter in each coating and ink. (K011)

Applicable Compliance Method: The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.1 of these terms and conditions.

USEPA Methods 24 and 24A, as applicable, shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings. If, pursuant to Methods 24 and 24A, 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.

Emissions Unit ID: **K011**

- c. Emission Limitations: 52.0 tpy VOCs, based upon a rolling, 12-month summation of the monthly emissions from this facility (K001 through K003, K006 through K011, & P001)
- Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.3 above.
- For Section C.3 above, formulation data shall be used to determine the VOC content of each coating, flexographic and rotogravure printing ink, adhesive, cleanup material, and related coating employed.
- d. Emission Limitations: 9.0 tpy individual HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (K001 through K003, K006 through K011, & P001)
- Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.4 above.
- For Section C.4 above, formulation data shall be used to determine the individual HAP content for each HAP of each coating, flexographic and rotogravure printing ink, adhesive, cleanup material, and related coating employed.
- e. Emission Limitations: 22.2 tpy combined HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (K001 through K003, K006 through K011, & P001)
- Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.5 above.
- For Section C.5 above, formulation data shall be used to determine the combined HAP content of each coating, flexographic and rotogravure printing ink, adhesive, cleanup material, and related coating employed.

## F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. PTI 16-02350 supersedes only the facility requirements (e.g., facility emissions limits, facility VOC & HAP material usage restrictions, monitoring and record keeping of facility emissions and

VOC & HAP material usage restrictions, etc.) of all previous air permits issued, or in the process of being issued, for this facility to allow for the addition of K011. PTI 16-02350 does not supersede any specific emissions unit requirements of any previously issued, or to be issued, air permits.

3. All terms and conditions of this permit are federally enforceable, except Section F.1.