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Facility Name: **National Carton & Coating Company**

Application Number: **08-3923**

Date: **January 6, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement

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of operation.

SOURCE OPERATION 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 and regulations.

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AIR EMISSION SUMMARY

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K002	Offset Printing Press #2	*	3745-31-05	3.7 lbs/hr; 40 lbs/day; 7.3 TPY VOC, including cleanup
			3745-21-07 (G) (2)	**

* BAT is compliance with applicable OAC rules and specified allowable emission rates; recordkeeping and reporting requirements.

** The BAT mass emission limitations are more stringent than the SIP rule.

SUMMARY

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TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	7.3

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WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Regional Air Pollution Control Agency, Montgomery County Health Department, 451 West Third Street, P.O. Box 972, Dayton, Ohio 45422.**

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

AIR POLLUTION NUISANCES PROHIBITED

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Potential to Emit

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The pound per hour emission limitation for volatile organic compounds is established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for the printing operation:
 - a. the company identification for each ink, varnish, coating, fountain solution and cleanup material employed;
 - b. the number of pounds or gallons of each ink, varnish, coating, fountain solution and cleanup material employed;
 - c. the volatile organic compound content of each ink, varnish, coating, fountain solution and cleanup material, in percent by weight or pounds per gallon, whichever is applicable (i.e., if the amount in pounds is recorded in section b., then record the VOC content in percent by weight; or, if the amount in gallons is recorded in section b., then record the VOC content in pounds per gallon);
 - d. the total volatile organic compound emission rate for all inks, varnishes, coatings, fountain solutions and cleanup materials (taking into account recovered materials and the 95% retentions rate of the inks to the substrate, i.e., 5% emission rate for inks in accordance with OEPA Engineering Guide #68), in pounds or tons per month;
 - e. the total number of days the emissions unit was in operation; and,
 - f. the average daily volatile organic compound emission rate for all inks, varnishes, coatings, fountain solutions and cleanup

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materials, i.e., (d)/(e), in pounds per day (average).

2. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average volatile organic compound emissions from the inks, varnishes, coatings, fountain solutions and cleanup materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.
2. The permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or record keeping information shall be submitted to the Regional Air Pollution Control;
 - 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 record keeping 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 Regional Air Pollution Control. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that

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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.)

D. Testing Requirements and Compliance Method Determinations

Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission limitation -
3.7 pounds VOC per hour

Compliance Method -
Compliance shall be determined by totaling the following products:

- a. Inks:

The maximum hourly ink usage is multiplied by the maximum VOC content of all inks employed. This product is then multiplied by a web solvent retention of 95% (1 - 0.95), in accordance with OEPA Engineering Guide #68 issued July 7, 1997.

- b. Varnishes:

The maximum hourly varnishes usage is multiplied by the maximum VOC content of all varnishes employed.

- c. Coatings:

The maximum hourly coating usage is multiplied by the maximum VOC content of all coatings employed.

- d. Fountain Solutions:

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The maximum hourly fountain solution usage is multiplied by the maximum VOC content of all fountain solutions employed.

e. Cleanup Materials:

The maximum hourly cleanup material usage is multiplied by the maximum VOC content of all cleanup materials employed.

2. Emission Limitation -
40 pounds VOC per day (average)

Compliance Method -

Compliance shall be based upon the record keeping as specified in Term and Condition B.1.f.

3. Emission Limitation -
7.3 tons VOC per year

Compliance Method -

Compliance shall be based upon the record keeping as specified in Term and Condition B.1. and shall be the sum of the 12 monthly volatile organic compound emission rates for the calendar year.