



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

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Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

8/5/2008

Certified Mail

Jim Edwards
Troy Laminating and Coating, Inc.
421 S. UNION ST.
TROY, OH 45373-0421

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0855140077
Permit Number: 08-04939
Permit Type: Chapter 31 mod
County: Miami

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
Yes	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Troy Daily News. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
RAPCA; Indiana

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Troy Laminating and Coating, Inc.

Issue Date: 8/5/2008

Permit Number: 08-04939

Permit Type: Chapter 31 mod

Permit Description: Chapter 31 modification replacing PTI 08-04796 issued 2/6/07 to increase coatings usage limitations.

Facility ID: 0855140077

Facility Location: Troy Laminating and Coating, Inc.
421 S. UNION ST.,
TROY, OH 45373-0421

Facility Description: Coated and Laminated Paper Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Andrew Weisman at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Troy Laminating and Coating (Troy Laminating) is a wide web paper and film coating facility located in Troy, (Miami County) Ohio. Miami County is attainment for ozone. Troy Laminating currently operates four coating lines (emissions units K002, K004, K005 and K007), coating mixing and blending equipment (P002, P011, P013 and P014) and several PTI exempt (less than 10 MMBtu) natural gas fired boilers and dryers. Troy Laminating has proposed to increase the volatile organic compound usage and emissions limitations on Coater #475, (emissions unit K010) that also includes an in line Flexographic printing station.

3. Facility Emissions and Attainment Status:

Miami County is attainment for ozone. Troy Laminating has a Title V Permit and must comply with requirements of 40 CFR Part 63, Subpart JJJJ (Paper and Other Web Coating MACT). The potential VOC emissions from Troy Laminating are over 900 tons per year. However, the actual VOC emissions for Troy Laminating are less than 30 tons per year, due to the replacement of solvent based coatings with water based coatings. All of the wide web coating operations at Troy Laminating are subject to the emissions limitations of OAC rule 3745-21-09(F) and the two flexographic printing stations on emissions units K004 and K010 are subject to the emissions limitations of OAC rule 3745-21-09(Y).

4. Source Emissions:

The potential VOC emissions from Troy Laminating are over 900 tons per year and potential hazardous air pollutants (HAP) emissions are also above major source levels for MACT applicability. Troy Laminating has a Title V permit. The coatings use on K010 consists of high volumes of low VOC (usually less than 0.2 lb VOC/gallon). Troy Laminating has requested an increase in the emissions limitation for K010 from 15.0 tons to 30.0 tons per year on a rolling 12-month basis. However, Troy laminating has requested the operational flexibility to comply with the emissions limitation of OAC rule 3745-21-09(F) by using smaller volumes of coatings that contain up to 2.9 lbs VOC/gallon without going through additional permitting. The VOC potential to emit (825 tons/year) at 2.9 pounds VOC/gallon is far greater than the major modification threshold of 40 tons per year for non attainment New Source Review. Therefore, the 30.0 tons per year VOC emissions limitation for the coating line will need to be established as a rolling 12-month VOC usage restriction.

5. Conclusion:

Troy Laminating will be issued a synthetic minor PTI to limit VOC emissions from emissions unit K010 to 30.0 tons per year on a rolling 12-month basis based on VOC usage restrictions. The synthetic minor VOC restrictions will preclude compliance with Non-Attainment New Source Review requirements.

6. Please provide additional notes or comments as necessary:



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install
Permit Number: 08-04939
Facility ID: 0855140077

None

Summary (for informational purposes only)
Total Permit Allowable Emissions:

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>Volatile organic compounds</u>	<u>30.0</u>



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

Air Pollution Permit-to-Install
for
Troy Laminating and Coating, Inc.

Facility ID: 0855140077
Permit Number: 08-04939
Permit Type: Chapter 31 mod
Issued: 8/5/2008
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install
 for
 Troy Laminating and Coating, Inc.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 08-04939

Facility ID: 0855140077

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0855140077

Facility Description: Paper, coated and laminated

Application Number(s): A0007951, A0035612

Permit Number: 08-04939

Permit Description: Chapter 31 modification replacing PTI 08-04796 issued 2/6/07 to increase coatings usage limitations.

Permit Type: Chapter 31 mod

Permit Fee: \$250.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 8/5/2008

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Troy Laminating and Coating, Inc.
421 S. UNION ST.
TROY, OH 45373-0421

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted a Permit-to-Install for the 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 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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 08-04939

Facility ID: 0855140077

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: 08-04939

Permit Description: Chapter 31 modification replacing PTI 08-04796 issued 2/6/07 to increase coatings usage limitations.

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

Emissions Unit ID:	K010
Company Equipment ID:	#475 COATER
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 08-04939

Facility ID: 0855140077

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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.

4. Monitoring and Related Record Keeping 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Regional Air Pollution Control Agency.



- (2) 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 Regional Air Pollution Control 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 A.15. below if no deviations occurred during the quarter.
- (3) 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 Regional Air Pollution Control 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.
- (4) This permit is for an emissions unit located at a Title V facility. 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.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Regional Air Pollution Control 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).

6. Compliance Requirements

- a) 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.
- b) 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.
- c) 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:



- (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Regional Air Pollution Control 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. 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 Regional Air Pollution Control 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 Regional Air Pollution Control 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) 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.
- b) If applicable, authorization to install any new 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 has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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.

16. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 08-04939

Facility ID: 0855140077

Effective Date: To be entered upon final issuance

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Regional Air Pollution Control Agency must be notified in writing of any transfer of this permit.

18. 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.

19. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 08-04939

Facility ID: 0855140077

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 08-04939

Facility ID: 0855140077

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K010, #475 COATER

Operations, Property and/or Equipment Description:

No. 475 Coater with Flexographic Printing Station

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(5) through d)(8) and e)(3).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-09(F) and 21-09(Y).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major New Source Review)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 30.0 tons per year based upon a rolling 12-month summation.
c.	OAC rule 3745-21-09(F)	The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.
d.	OAC rule 3745-21-09(Y)	See b)(2)a.
e.	40 CFR Part 63, Subpart KK [40 CFR 63.821(a)(2)(ii)(A)]	See b)(2)b.
f.	40 CFR Part 63, Subpart JJJJ, [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.
g.	40 CFR Part 63, Subpart A	See Section A.II.2
h.	OAC rule 3745-114 and ORC 3704.03(F)(4)(c)	See d)(5) through d)(8) and e)(3)

(2) Additional Terms and Conditions

a. The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year, and



therefore, are exempt from the requirements of OAC rule 21-09(Y)(1), per OAC rule 3745-21-09(Y)(2)(b).

- b. The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print stations in each month never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations. Provided that the permittee maintains records as required in 40 CFR 63.829(f), the flexographic printing station on this emissions unit is not an affected source subject to the emissions limitations of 40 CFR Part 63, Subpart KK, per 40 CFR 63.821(a)(2)(ii)(A).

c) Operational Restrictions

- (1) The total VOC in raw material input from coatings, thinners, and clean up material usage for this emissions unit shall not exceed 60,000 pounds based upon a rolling 12-month summation. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC in raw material input from coatings, thinners, and clean up material usage, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit.
 - a. The company identification for each coating, flexographic ink, thinner and cleanup material employed.
 - b. The number of gallons of each coating, flexographic ink, thinner and cleanup material employed.
 - c. The VOC content of each coating, as applied, in pounds of VOC per gallon excluding water and exempt solvents.
 - d. The daily volume weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.
- (2) The permittee shall collect and record the following information each month for this emissions unit.
 - a. The company identification for each coating, flexographic ink, thinner and cleanup material employed.
 - b. The number of gallons of each coating, flexographic ink, thinner and cleanup material employed.



- c. The VOC content of each coating, thinner and cleanup material, in pounds per gallon.
 - d. The VOC emission rate for all coatings, flexographic inks, thinners and cleanup materials, in pounds or tons per month (b x c).
- (3) Per 40 CFR 63.3370(a)(6) affected sources (facilities) using a combination of compliant coatings and control devices to demonstrate compliance with 40 CFR 63.3320(b)(3) shall follow the procedures set out in 40 CFR 63.3370(f) according to 40 CFR 63.3370(n). The coating operations on this emissions unit are uncontrolled, therefore, the capture and control requirements of 40 CFR 63.3370(f) are not applicable. According to 40 CFR 63.3370(n) the permittee shall collect and record the following information each month for this emissions unit.
- a. Per 40 CFR 63.3370(n)(4), the total mass of organic HAP applied calculated according to Equation 6 of 40 CFR 63.3370(d).
 - b. The total mass of organic HAP emitted, calculated according to 40 CFR 63.3370(n)(5)(i), (i.e., the sum of all organic HAP applied on uncontrolled coating operations calculated according to 40 CFR 63.3370(n)(4) plus the organic HAP emissions from coating operations using capture and control calculated according to 40 CFR 63.3370(n)(3)).
 - c. The total mass of solids applied, calculated according to 40 CFR 63.3370(n)(5)(ii) and 63.3360(d). (i.e., the sum of all coating solids applied).
 - d. The organic HAP emission rate, in kg of organic HAP per kg of solids applied according to 40 CFR 63.3370(n)(5)(iii) and Equation 9 of 40 CFR 63.3370(h).
- (4) According 40 CFR 63.829(f), the owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of Sec. 63.821(a)(2)(ii)(A) shall maintain the records specified in paragraphs (f)(1) and (f)(2) of this section for five years and submit them to the Administrator and the appropriate Ohio EPA District Office or local air agency upon request:
- a. The total mass of each material applied each month on the press, including all inboard and outboard stations, and
 - b. The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.
- (5) The permit-to-install (PTI), application for this/these emissions unit(s) K010 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The ~~A~~Toxic Air Contaminant Statute~~@~~, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio



EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s): Toxic Contaminant: Ammonia

TLV (mg/m³): 17.382

Maximum Hourly Emission Rate (lbs/hr): 2.00

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 188

MAGLC (µg/m³): 414

The permittee, has demonstrated that emissions of ammonia, from emissions unit K010, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the



predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any



determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

- (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute[®], ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded 2.9 lbs VOC/gallon, excluding water and exempt solvents. 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 after the exceedance occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports which identify the following information all Exceedance of the rolling, 12-month limitation on VOC usage ;and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedance of the maximum allowable cumulative coating usage levels. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - Standard Terms and Conditions, Section A of this permit.
- a. The permittee shall submit semi-annual compliance reports according to the requirements of 40 CFR 63.3400(c). The reports shall include:
- b. Company name and address.
- c. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the report.
- d. Date of report beginning and end dates for the reporting period.
- e. If there are no deviations from any emissions limitations (emissions limit or operating limit) that apply to you, a statement that there were no deviations from the emissions limitations, and that continuous monitoring system (CMS) was inoperative, inactive, malfunctioning, out-of-control, repaired or adjusted.
- f. For each deviation from an emission limitation (emissions limit or operating limit) that applies and occurs at an affected source where you are not using a continuous emissions monitoring system (CEMS) to comply with the emissions limitations in 40 CFR 63, Subpart JJJJ, the compliance report must also contain:
- i. The total operating time of each affected source during the reporting period.
- ii. The number, duration and cause of the deviations (including unknown cause), if applicable, and the corrective action taken.



- iii. The number, duration, and cause for continuous parameter monitoring system (CPMS) downtime incidents, if applicable, other than downtime associated with zero, span and calibration checks.

The compliance reports shall be submitted to the Administrator and the appropriate Ohio EPA District Office or local air agency and cover semiannual reporting periods from January 1 to June 30 and July 1 to December 31 of each year. The compliance reports shall be post marked no later than July 31 or January 31 whichever is the first date after following the end of the semiannual reporting period.

- (3) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute^o, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

f) Testing Requirements

- (1) Compliance with the emissions limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation -

The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

Applicable Compliance Method -

Compliance shall be based on coating formulation data and if required VOC content shall be determined according to the requirements of U.S. Reference Method 24 of 40 CFR Part 60, Appendix A.

- b. Emissions Limitation -

The VOC emissions from this emissions unit shall not exceed 30.0 tons per year based upon a rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in section d)(2) of this permit and shall be the sum of the monthly emissions rates for the previous twelve months.

- c. Emissions Limitation -

The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year.

Applicable Compliance Method -



Compliance shall be based upon the record keeping requirements in section d)(2) of this permit and shall be the sum of all flexographic printing ink used at the facility for the calendar year.

d. Emissions Limitation -

The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print stations in each month never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in section d)(4) according to the requirements of 40 CFR 63.829(f).

e. Emissions Limitation -

The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in section d)(3) The organic HAP content, of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(c). The VOC content and coating solids content of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(d).

g) Miscellaneous Requirements

- (1) This PTI is a modification of PTI 08-04796 issued February 6, 2007 to allow for an increase in VOC usage and emissions from 15.0 tons per year to 30.0 tons per year.