



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
STARK COUNTY
Application No: 15-1316**

CERTIFIED MAIL

DATE: October 27, 1999

Buckeye Packaging Comp Inc
Gordon Fox
PO Box 996
Hartville, OH 44632

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.



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

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
CANTON CITY HEALTH DEPARTMENT
West Virginia Division of Environmental Protection
Pennsylvania Department of Environmental Resources

Stark County Area Transportation Study

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

**Terms and
Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 15-1316

Application Number: 15-1316
APS Premise Number: 1576011509
Permit Fee: **To be entered upon final issuance**
Name of Facility: Buckeye Packaging Comp Inc
Person to Contact: Gordon Fox
Address: PO Box 996
Hartville, OH 44632

Location of proposed air contaminant source(s) [emissions unit(s)]:
**12223 Marlboro Avenue
Marlboro Township, Ohio**

Description of proposed emissions unit(s):
**MODIFICATION OF SEVEN PRINTING PRESSES TO ESTABLISH FACILITY-WIDE EMISSIONS
LIMIT.**

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

Buckeye Packaging Comp Inc

PTI Application: **15-1316**

Date: To be entered upon final issuance

Facility ID: **1576011509**

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 Related to Monitoring and Recordkeeping 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

Buckeye Packaging Comp Inc

Facility ID: **1576011509**

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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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) days after

Buckeye Packaging Comp Inc

PTI Application: **15-1316**

Date: To be entered upon final issuance

Facility ID: **1576011509**

commencing operation of the emissions unit(s) covered by this permit.

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</u>
OC	55.2

Buckeye Packaging Comp Inc
PTI Application: 15-1216
Date:

Facility ID: 1576011509

Emissions Unit ID: **K001**

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>
1-6 color flexographic printing press used to print on polyethylene; Buckeye Flexographic Press #4	OAC rule 3745-31-05	OC Limit: 100 lbs/hr 55.2 tons/year
(MODIFICATION)	OAC rule 3745-21-09(Y)	The combined emissions of OC from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons per year, based upon a rolling, 365-day summation of the daily emissions. see section 2.a. below.
		The total water-based ink usage for emissions units K001, K003, K004, K005, K006, and K007 shall consist of at least 75% of the overall ink usage on a monthly basis. see section 2.b. below.
		Any printing line which is located at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines is less than or equal to 148 tons/year is

Date: To be entered upon final issuance

exempt from this rule.

2. Additional Terms and Conditions

2.a This allowable includes any solvent used to make the ink press ready and for press parts and worker cleanup. The permittee has existing records (from the past year) which demonstrate compliance with the restricted OC emissions of this PTI therefore month-to-month limitations are not needed for the first 12 months after issuance of this permit.

2.b A water-based ink shall be defined as an ink in which the organic compound content of the volatile matter is less than 25% of the total volume of the volatile matter in the ink (prior to the addition of any thinning solvents). Compliance with this term shall be determined by calculating the gallons (prior to the addition of any thinning solvents) of the solvent-based ink used per month as a percentage of the sum of the gallons of solvent-based inks (prior to the addition of any thinning solvents) and the gallons of water-based ink (prior to the addition of any solvents) per month .

B. Operational Restrictions

1. None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions units K001, K003, K004, K005, K006, and K007 (records do not have to be maintained for individual presses):
 - a. the company identification for each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - b. the number of gallons of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - c. the organic compound content of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;

Buckeye Packaging Comp Inc

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Facility ID: 1576011509

Emissions Unit ID: **K001**

- d. the water content of any ink employed (prior to the addition of any thinning solvents);
- e. the total OC emissions from all ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity, in pounds or tons;
- f. a calculation of the percentage of inks employed which are water-based inks (see section A.2.b.); and,
- g. the total tons of ink used. (This shall include any initial thinning solvents, including water, used to get the ink press ready. It shall not include any solvents used to maintain viscosity.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day emission limitation for OC;
 - b. an identification of each month which showed a violation of the limit that no more than 25% of the gallons of inks employed can be solvent-based inks and the actual percentage of solvent-based inks employed for each such month; and,
 - c. an identification of any year in which the annual ink usage exceeds a total of 148 tons from all emissions units at this facility. This ink usage shall include any initial thinning solvents, including water, used to make the ink press ready. It shall not include any solvents used to maintain viscosity.
2. The permittee shall submit an annual report which specifies the total organic compound emissions rate from emissions units K001, K003, K004, K005, K006, & K007 for each month of the previous calendar year. The permittee shall also submit an annual report which specifies the tons of ink and coatings employed at this facility in all flexographic, packaging rotogravure and publication rotogravure printing lines during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Date: To be entered upon final issuance

- a. Emission Limitation:

100 lbs OC/hour

Applicable Compliance Method:

This limit was based on a one-time calculation of the maximum emissions that can be generated by this emissions unit.

- b. Emission Limitation:

55.2 tons OC/yr

Applicable Compliance Method:

K001, K003, K004, K005, K006, and K007 are limited to a total of 55.2 tons OC emissions per year. Compliance with this limit will ensure compliance with the 55.2 tons OC/yr limit for K001.

Date: To be entered upon final issuance

c. Emission Limitation:

Requirement that at least 75% of the inks used in emissions units K001, K003, K004, K005, K006, and K007 be water-based inks.

Applicable Compliance Method:

Recordkeeping

d. Emission Limitation:

The total OC emissions from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons/year, based upon a rolling, 365-day summation of the OC emissions.

Applicable Compliance Method:

Recordkeeping

F. Miscellaneous Requirements

1. This emissions unit was part of permit to install 15-589 which was originally issued on December 5, 1990. This permit to install supersedes the requirements of PTI 15-589.
2. This permit allows the use of material specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Acetate

TLV (ug/m³): 950,040

Maximum Hourly Emission Rate (lbs/hr): 109.5

Buckeye Packaging Comp Inc

PTI Application: **15 1316**

Date:

Facility ID: **1576011509**

Emissions Unit ID: **K001**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22,550

MAGLC (ug/m3): 22,620

Date: To be entered upon final issuance

Pollutant: n-Propyl Acetate

TLV (ug/m³): 840,000

Maximum Hourly Emission Rate (lbs/hr): 97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 19,980

MAGLC (ug/m³): 20,000

Pollutant: 2-Butoxyethanol

TLV (ug/m³): 120,120

Maximum Hourly Emission Rate (lbs/hr): 13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,680

MAGLC (ug/m³): 2,860

Pollutant: n-Heptane and Isomers

TLV (ug/m³): 349,860

Maximum Hourly Emission Rate (lbs/hr): 40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 8,230

MAGLC (ug/m³): 8,330

Pollutant: Dipropylene Glycol Methyl Ether

TLV (ug/m³): 600,180

Maximum Hourly Emission Rate (lbs/hr): 68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14,010

MAGLC (ug/m³): 14,290

Date: To be entered upon final issuance

Pollutant: Methyl Alcohol

TLV (ug/m³) 200,000

Maximum Hourly Emission Rate (lbs/hr): 23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4,740

MAGLC (ug/m³): 4,760

Pollutant: Isopropyl Alcohol

TLV (ug/m³): 980,000

Maximum Hourly Emission Rate (lbs/hr): 113

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,270

MAGLC (ug/m³): 23,330

Pollutant: n-Propyl Alcohol

TLV (ug/m³): 500,000

Maximum Hourly Emission Rate (lbs/hr): 56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 11,530

MAGLC (ug/m³): 11,900

Pollutant: Stoddard Solvent

TLV (ug/m³): 525,000

Maximum Hourly Emission Rate (lbs/hr): 60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 12,360

MAGLC (ug/m³) 12,500

Date: To be entered upon final issuance

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 the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used or use of new materials that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials used or use of new materials that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned changes as a "modification" requiring a permit to install if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Bucke

PTI A₁

Date: To be entered upon final issuance

Emissions Unit ID: **K001**

Bucke

PTI A₁

Emissions Unit ID: **K003**

Date: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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>
1-6 color flexographic printing press used to print on polyethylene; Buckeye Flexographic Press #2 (MODIFICATION)	OAC rule 3745-31-05	OC Limit: 100 lbs/hr 55.2 tons/year The combined emissions of OC from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons per year, based upon a rolling, 365-day summation of the daily emissions. see section 2.a. below. The total water-based ink usage for emissions units K001, K003, K004, K005, K006, and K007 shall consist of at least 75% of the overall ink usage on a monthly basis. See section 2.b. below. Any printing line which is located at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging
	OAC rule 3745-21-09(Y)	

Buckeye Packaging Comp Inc

PTI Application: **15-1316**

Date:

Facility ID: **1576011509**

Emissions Unit ID: **K003**

rotogravure and publication
rotogravure printing lines is less
than or equal to 148 tons/year
is exempt from this rule.

Date: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** This allowable includes any solvent used to make the ink press ready and for press parts and worker cleanup. The permittee has existing records (from the past year) which demonstrate compliance with the restricted OC emissions of this PTI therefore month-to-month limitations are not needed for the first 12 months after issuance of this permit.
- 2.b** A water-based ink shall be defined as an ink in which the organic compound content of the volatile matter is less than 25% of the total volume of the volatile matter in the ink (prior to the addition of any thinning solvents). Compliance with this term shall be determined by calculating the gallons (prior to the addition of any thinning solvents) of the solvent-based ink used per month as a percentage of the sum of the gallons of solvent-based inks (prior to the addition of any thinning solvents) and the gallons of water-based ink (prior to the addition of any solvents) per month .

B. Operational Restrictions

1. None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions units K001, K003, K004, K005, K006, and K007 (records do not have to be maintained for individual presses):
 - a. the company identification for each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - b. the number of gallons of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - c. the organic compound content of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - d. the water content of any ink employed (prior to the addition of any thinning

Date: To be entered upon final issuance

solvents);

- e. the total OC emissions from all ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity, in pounds or tons;
- f. a calculation of the percentage of inks employed which are water-based inks (see section A.2.b.); and,
- g. the total tons of ink used. (This shall include any initial thinning solvents, including water, used to get the ink press ready. It shall not include any solvents used to maintain viscosity.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day emission limitation for OC;
 - b. an identification of each month which showed a violation of the limit that no more than 25% of the gallons of inks employed can be solvent-based inks and the actual percentage of solvent-based inks employed for each such month; and,
 - c. an identification of any year in which the annual ink usage exceeds a total of 148 tons from all emissions units at this facility. This ink usage shall include any initial thinning solvents, including water, used to make the ink press ready. It shall not include any solvents used to maintain viscosity.
2. The permittee shall submit an annual report which specifies the total organic compound emissions rate from emissions units K001, K003, K004, K005, K006, & K007 for each month of the previous calendar year. The permittee shall also submit an annual report which specifies the tons of ink and coatings employed at this facility in all flexographic, packaging rotogravure and publication rotogravure printing lines during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following methods(s):

Buckeye Packaging Comp Inc

PTI Application: **15-1316**

Date:

Facility ID: **1576011509**

Emissions Unit ID: **K003**

a. Emission Limitation:

100 lbs OC/hour

Applicable Compliance Method:

This limit was based on a one-time calculation of the maximum emissions that can be generated by this emissions unit.

b. Emission Limitation:

55.2 tons OC/yr

Date: To be entered upon final issuance

Applicable Compliance Method:

K001, K003, K004, K005, K006, and K007 are limited to a total of 55.2 tons OC emissions per year. Compliance with this limit will ensure compliance with the 55.2 tons OC/yr limit for K003.

c. Emission Limitation:

Requirement that at least 75% of the inks used in emissions units K001, K003, K004, K005, K006, and K007 be water-based inks.

Applicable Compliance Method:

Recordkeeping

d. Emission Limitation:

The total OC emissions from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons/year, based upon a rolling, 365-day summation of the OC emissions.

Applicable Compliance Method:

Recordkeeping

F. Miscellaneous Requirements

1. This emissions unit was part of permit to install 15-236 which was originally issued on August 6, 1986 and was modified on April 29, 1992. This permit to install supersedes the requirements of PTI 15-236.
2. This permit allows the use of material specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each

Date: To be entered upon final issuance

pollutant:

Pollutant: Isopropyl Acetate

TLV (ug/m3): 950,040

Maximum Hourly Emission Rate (lbs/hr): 109.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22,550

MAGLC (ug/m3): 22,620

Pollutant: n-Propyl Acetate

TLV (ug/m3): 840,000

Maximum Hourly Emission Rate (lbs/hr): 97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 19,980

MAGLC (ug/m3): 20,000

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 120,120

Maximum Hourly Emission Rate (lbs/hr): 13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,680

MAGLC (ug/m3): 2,860

Pollutant: n-Heptane and Isomers

TLV (ug/m3): 349,860

Maximum Hourly Emission Rate (lbs/hr): 40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8,230

Date: To be entered upon final issuance

MAGLC (ug/m³): 8,330

Pollutant: Dipropylene Glycol Methyl Ether

TLV (ug/m³): 600,180

Maximum Hourly Emission Rate (lbs/hr): 68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14,010

MAGLC (ug/m³): 14,290

Pollutant: Methyl Alcohol

TLV (ug/m³) 200,000

Maximum Hourly Emission Rate (lbs/hr): 23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4,740

MAGLC (ug/m³): 4,760

Pollutant: Isopropyl Alcohol

TLV (ug/m³): 980,000

Maximum Hourly Emission Rate (lbs/hr): 113

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,270

MAGLC (ug/m³): 23,330

Pollutant: n-Propyl Alcohol

TLV (ug/m³): 500,000

Maximum Hourly Emission Rate (lbs/hr): 56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 11,530

Buckeye Packaging Comp IncPTI Application: **15-1316****Date:**Facility ID: **1576011509**Emissions Unit ID: **K003**

MAGLC (ug/m3): 11,900

Pollutant: Stoddard Solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,360

MAGLC (ug/m3) 12,500

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 the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used or use of new materials that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials used or use of new materials that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned changes as a "modification" requiring a permit to install if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

Date: To be entered upon final issuance

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Bucke

PTI A₁

Emissions Unit ID: **K004**

Date: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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>
2-color flexographic printing press used to print on polyethylene; Buckeye Flexographic Press #3 (MODIFICATION)	OAC rule 3745-31-05	OC Limit: 100 lbs/hr 55.2 tons/year The combined emissions of OC from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons per year, based upon a rolling, 365-day summation of the daily emissions. see section 2.a. below. The total water-based ink usage for emissions units K001, K003, K004, K005, K006, and K007 shall consist of at least 75% of the overall ink usage on a monthly basis. See section 2.b. below. Any printing line which is located at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging
	OAC rule 3745-21-09(Y)	

rotogravure and publication
rotogravure printing lines is less
than or equal to 148 tons/year
is exempt from this rule.

2. Additional Terms and Conditions

- 2.a** This allowable includes any solvent used to make the ink press ready and for press parts and worker cleanup. The permittee has existing records (from the past year) which demonstrate compliance with the restricted OC emissions of this PTI therefore month-to-month limitations are not needed for the first 12 months after issuance of this permit.
- 2.b** A water-based ink shall be defined as an ink in which the organic compound content of the volatile matter is less than 25% of the total volume of the volatile matter in the ink (prior to the addition of any thinning solvents). Compliance with this term shall be determined by calculating the gallons (prior to the addition of any thinning solvents) of the solvent-based ink used per month as a percentage of the sum of the gallons of solvent-based inks (prior to the addition of any thinning solvents) and the gallons of water-based ink (prior to the addition of any solvents) per month .

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions units K001, K003, K004, K005, K006, and K007 (records do not have to be maintained for individual presses):
 - a. the company identification for each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - b. the number of gallons of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - c. the organic compound content of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain

Date: To be entered upon final issuance

viscosity employed;

- d. the water content of any ink employed (prior to the addition of any thinning solvents);
- e. the total OC emissions from all ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity, in pounds or tons;
- f. a calculation of the percentage of inks employed which are water-based inks (see section A.2.b.); and,
- g. the total tons of ink used. (This shall include any initial thinning solvents, including water, used to get the ink press ready. It shall not include any solvents used to maintain viscosity.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day emission limitation for OC;
 - b. an identification of each month which showed a violation of the limit that no more than 25% of the gallons of inks employed can be solvent-based inks and the actual percentage of solvent-based inks employed for each such month; and,
 - c. an identification of any year in which the annual ink usage exceeds a total of 148 tons from all emissions units at this facility. This ink usage shall include any initial thinning solvents, including water, used to make the ink press ready. It shall not include any solvents used to maintain viscosity.
2. The permittee shall submit an annual report which specifies the total organic compound emissions rate from emissions units K001, K003, K004, K005, K006, & K007 for each month of the previous calendar year. The permittee shall also submit an annual report which specifies the tons of ink and coatings employed at this facility in all flexographic, packaging rotogravure and publication rotogravure printing lines during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

Date: To be entered upon final issuance

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following methods(s):

- a. Emission Limitation:

100 lbs OC/hour

Applicable Compliance Method:

This limit was based on a one-time calculation of the maximum emissions that can be generated by this emissions unit.

- b. Emission Limitation:

55.2 tons OC/yr

Applicable Compliance Method:

K001, K003, K004, K005, K006, and K007 are limited to a total of 55.2 tons OC emissions per year. Compliance with this limit will ensure compliance with the 55.2 tons OC/yr limit for K004.

Buckeye Packaging Comp Inc

PTI Application: 15-1216

Date:

Facility ID: 1576011509

Emissions Unit ID: **K004**

c. Emission Limitation:

Requirement that at least 75% of the inks used in emissions units K001, K003, K004, K005, K006, and K007 be water-based inks.

Applicable Compliance Method:

Recordkeeping

d. Emission Limitation:

The total OC emissions from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons/year, based upon a rolling, 365-day summation of the OC emissions.

Applicable Compliance Method:

Recordkeeping

F. Miscellaneous Requirements

1. This emissions unit was part of permit to install 15-236, which was originally issued on August 6, 1986 and was modified on April 29, 1992. This permit to install supersedes the requirements of PTI 15-236.
2. This permit allows the use of material specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Acetate

TLV (ug/m3): 950,040

Maximum Hourly Emission Rate (lbs/hr): 109.5

BuckePTI A₁Emissions Unit ID: **K004****Date: To be entered upon final issuance**Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 22,550MAGLC (ug/m³): 22,620**Pollutant: n-Propyl Acetate**TLV (ug/m³): 840,000

Maximum Hourly Emission Rate (lbs/hr): 97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 19,980MAGLC (ug/m³): 20,000**Pollutant: 2-Butoxyethanol**TLV (ug/m³): 120,120

Maximum Hourly Emission Rate (lbs/hr): 13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,680MAGLC (ug/m³): 2,860**Pollutant: n-Heptane and Isomers**TLV (ug/m³): 349,860

Maximum Hourly Emission Rate (lbs/hr): 40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 8,230MAGLC (ug/m³): 8,330**Pollutant: Dipropylene Glycol Methyl Ether**TLV (ug/m³): 600,180

Date: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14,010

MAGLC (ug/m³): 14,290

Pollutant: Methyl Alcohol

TLV (ug/m³): 200,000

Maximum Hourly Emission Rate (lbs/hr): 23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4,740

MAGLC (ug/m³): 4,760

Pollutant: Isopropyl Alcohol

TLV (ug/m³): 980,000

Maximum Hourly Emission Rate (lbs/hr): 113

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,270

MAGLC (ug/m³): 23,330

Pollutant: n-Propyl Alcohol

TLV (ug/m³): 500,000

Maximum Hourly Emission Rate (lbs/hr): 56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 11,530

MAGLC (ug/m³): 11,900

Pollutant: Stoddard Solvent

TLV (ug/m³): 525,000

Date: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 12,360

MAGLC (ug/m³) 12,500

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 the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used or use of new materials that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials used or use of new materials that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned changes as a "modification" requiring a permit to install if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

Buckeye Packaging Comp Inc

PTI Application: **15-1216**

Date:

Facility ID: **1576011509**

Emissions Unit ID: **K004**

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Bucke

PTI A₁

Emissions Unit ID: **K005**

Date: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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>
1-6 color flexographic printing press used to print on polyethylene; Buckeye Flexographic Press #5 (MODIFICATION)	OAC rule 3745-31-05	OC Limit: 100 lbs/hr 55.2 tons/year The combined emissions of OC from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons per year, based upon a rolling, 365-day summation of the daily emissions. see section 2.a. below. The total water-based ink usage for emissions units K001, K003, K004, K005, K006, and K007 shall consist of at least 75% of the overall ink usage on a monthly basis. See section 2.b. below. Any printing line which is located at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging rotogravure and publication
	OAC rule 3745-21-09(Y)	

BuckePTI A₁Emissions Unit ID: **K005****Date: To be entered upon final issuance**

rotogravure printing lines is less than or equal to 148 tons/year is exempt from this rule.

2. Additional Terms and Conditions

- 2.a** This allowable includes any solvent used to make the ink press ready and for press parts and worker cleanup. The permittee has existing records (from the past year) which demonstrate compliance with the restricted OC emissions of this PTI therefore month-to-month limitations are not needed for the first 12 months after issuance of this permit.
- 2.b** A water-based ink shall be defined as an ink in which the organic compound content of the volatile matter is less than 25% of the total volume of the volatile matter in the ink (prior to the addition of any thinning solvents). Compliance with this term shall be determined by calculating the gallons (prior to the addition of any thinning solvents) of the solvent-based ink used per month as a percentage of the sum of the gallons of solvent-based inks (prior to the addition of any thinning solvents) and the gallons of water-based ink (prior to the addition of any solvents) per month .

B. Operational Restrictions

1. None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions units K001, K003, K004, K005, K006, and K007 (records do not have to be maintained for individual presses):
 - a. the company identification for each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - b. the number of gallons of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - c. the organic compound content of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain

viscosity employed;

- d. the water content of any ink employed (prior to the addition of any thinning solvents);
- e. the total OC emissions from all ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity, in pounds or tons;
- f. a calculation of the percentage of inks employed which are water-based inks (see section A.2.b.); and,
- g. the total tons of ink used. (This shall include any initial thinning solvents, including water, used to get the ink press ready. It shall not include any solvents used to maintain viscosity.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day emission limitation for OC;
 - b. an identification of each month which showed a violation of the limit that no more than 25% of the gallons of inks employed can be solvent-based inks and the actual percentage of solvent-based inks employed for each such month; and,
 - c. an identification of any year in which the annual ink usage exceeds a total of 148 tons from all emissions units at this facility. This ink usage shall include any initial thinning solvents, including water, used to make the ink press ready. It shall not include any solvents used to maintain viscosity.
2. The permittee shall submit an annual report which specifies the total organic compound emissions rate from emissions units K001, K003, K004, K005, K006, & K007 for each month of the previous calendar year. The permittee shall also submit an annual report which specifies the tons of ink and coatings employed at this facility in all flexographic, packaging rotogravure and publication rotogravure printing lines during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions

Date: To be entered upon final issuance

shall be determined in accordance with the following methods(s):

a. Emission Limitation:

100 lbs OC/hour

Applicable Compliance Method:

This limit was based on a one-time calculation of the maximum emissions that can be generated by this emissions unit.

b. Emission Limitation:

55.2 tons OC/yr

Applicable Compliance Method:

K001, K003, K004, K005, K006, and K007 are limited to a total of 55.2 tons OC emissions per year. Compliance with this limit will ensure compliance with the 55.2 tons OC/yr limit for K005.

BuckePTI A₁Emissions Unit ID: **K005****Date: To be entered upon final issuance**

c. Emission Limitation:

Requirement that at least 75% of the inks used in emissions units K001, K003, K004, K005, K006, and K007 be water-based inks.

Applicable Compliance Method:

Recordkeeping

d. Emission Limitation:

The total OC emissions from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons/year, based upon a rolling, 365-day summation of the OC emissions.

Applicable Compliance Method:

Recordkeeping

F. Miscellaneous Requirements

1. This emissions unit was part of permit to install 15-723 which was originally issued on December 11, 1991. This permit to install supersedes the requirements of PTI 15-723.
2. This permit allows the use of material specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Acetate

TLV (ug/m³): 950,040

Buckeye Packaging Comp Inc

PTI Application: 15-1216

Date:

Facility ID: 1576011509

Emissions Unit ID: **K005**

Maximum Hourly Emission Rate (lbs/hr): 109.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 22,550

MAGLC (ug/m3): 22,620

Pollutant: n-Propyl Acetate

TLV (ug/m3): 840,000

Maximum Hourly Emission Rate (lbs/hr): 97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 19,980

MAGLC (ug/m3): 20,000

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 120,120

Maximum Hourly Emission Rate (lbs/hr): 13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,680

MAGLC (ug/m3): 2,860

Pollutant: n-Heptane and Isomers

TLV (ug/m3): 349,860

Maximum Hourly Emission Rate (lbs/hr): 40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8,230

MAGLC (ug/m3): 8,330

Pollutant: Dipropylene Glycol Methyl Ether

TLV (ug/m3): 600,180

Date: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14,010

MAGLC (ug/m³): 14,290

Pollutant: Methyl Alcohol

TLV (ug/m³) 200,000

Maximum Hourly Emission Rate (lbs/hr): 23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4,740

MAGLC (ug/m³): 4,760

Pollutant: Isopropyl Alcohol

TLV (ug/m³): 980,000

Maximum Hourly Emission Rate (lbs/hr): 113

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,270

MAGLC (ug/m³): 23,330

Pollutant: n-Propyl Alcohol

TLV (ug/m³): 500,000

Maximum Hourly Emission Rate (lbs/hr): 56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 11,530

MAGLC (ug/m³): 11,900

Pollutant: Stoddard Solvent

TLV (ug/m³): 525,000

Date: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 12,360

MAGLC (ug/m³) 12,500

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 the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used or use of new materials that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials used or use of new materials that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned changes as a "modification" requiring a permit to install if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

Bucke

PTI A₁

Emissions Unit ID: **K005**

Date: To be entered upon final issuance

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Bucke

PTI A₁

Emissions Unit ID: **K006**

Date: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

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>
1-6 color flexographic printing press used to print on polyethylene; Buckeye Flexographic Press #6 (MODIFICATION)	OAC rule 3745-31-05	OC Limit: 100 lbs/hr 55.2 tons/year The combined emissions of OC from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons per year, based upon a rolling, 365-day summation of the daily emissions. see section 2.a. below. The total water-based ink usage for emissions units K001, K002, K003, K004, K005, K006, and K007 shall consist of at least 75% of the overall ink usage on a monthly basis. See section 2.b. below. Any printing line which is located at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging rotogravure and publication
	OAC rule 3745-21-09(Y)	

rotogravure printing lines is less than or equal to 148 tons/year is exempt from this rule.

2. Additional Terms and Conditions

- 2.a** This allowable includes any solvent used to make the ink press ready and for press parts and worker cleanup. The permittee has existing records (from the past year) which demonstrate compliance with the restricted OC emissions of this PTI therefore month-to-month limitations are not needed for the first 12 months after issuance of this permit.
- 2.b** A water-based ink shall be defined as an ink in which the organic compound content of the volatile matter is less than 25% of the total volume of the volatile matter in the ink (prior to the addition of any thinning solvents). Compliance with this term shall be determined by calculating the gallons (prior to the addition of any thinning solvents) of the solvent-based ink used per month as a percentage of the sum of the gallons of solvent-based inks (prior to the addition of any thinning solvents) and the gallons of water-based ink (prior to the addition of any solvents) per month .

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions units K001, K003, K004, K005, K006, and K007 (records do not have to be maintained for individual presses):
 - a. the company identification for each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - b. the number of gallons of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - c. the organic compound content of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;

Date: To be entered upon final issuance

- d. the water content of any ink employed (prior to the addition of any thinning solvents);
- e. the total OC emissions from all ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity, in pounds or tons;
- f. a calculation of the percentage of inks employed which are water-based inks (see section A.2.b.); and,
- g. the total tons of ink used. (This shall include any initial thinning solvents, including water, used to get the ink press ready. It shall not include any solvents used to maintain viscosity.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day emission limitation for OC;
 - b. an identification of each month which showed a violation of the limit that no more than 25% of the gallons of inks employed can be solvent-based inks and the actual percentage of solvent-based inks employed for each such month; and,
 - c. an identification of any year in which the annual ink usage exceeds a total of 148 tons from all emissions units at this facility. This ink usage shall include any initial thinning solvents, including water, used to make the ink press ready. It shall not include any solvents used to maintain viscosity.
2. The permittee shall submit an annual report which specifies the total organic compound emissions rate from emissions units K001, K003, K004, K005, K006, & K007 for each month of the previous calendar year. The permittee shall also submit an annual report which specifies the tons of ink and coatings employed at this facility in all flexographic, packaging rotogravure and publication rotogravure printing lines during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions

Buckeye Packaging Comp Inc

PTI Application: 15-1216

Date:

Facility ID: 1576011509

Emissions Unit ID: **K006**

shall be determined in accordance with the following method(s):

a. Emission Limitation:

100 lbs OC/hour

Applicable Compliance Method:

This limit was based on a one-time calculation of the maximum emissions that can be generated by this emissions unit.

b. Emission Limitation:

55.2 tons OC/yr

Applicable Compliance Method:

K001, K003, K004, K005, K006, and K007 are limited to a total of 55.2 tons OC emissions per year. Compliance with this limit will ensure compliance with the 55.2 tons OC/yr limit for K001.

BuckePTI A₁Emissions Unit ID: **K006****Date: To be entered upon final issuance**

c. Emission Limitation:

Requirement that at least 75% of the inks used in emissions units K001, K003, K004, K005, K006, and K007 be water-based inks.

Applicable Compliance Method:

Recordkeeping

d. Emission Limitation:

The total OC emissions from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons/year, based upon a rolling, 365-day summation of the OC emissions.

Applicable Compliance Method:

Recordkeeping

F. Miscellaneous Requirements

1. This emissions unit was part of permit to install 15-1064 which was originally issued in November 3, 1993 and modified on June 28, 1995. This permit to install supersedes the requirements of PTI 15-1064.
2. This permit allows the use of material specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Isopropyl Acetate

TLV (ug/m³): 950,040

Date: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 109.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 22,550

MAGLC (ug/m³): 22,620

Pollutant: n-Propyl Acetate

TLV (ug/m³): 840,000

Maximum Hourly Emission Rate (lbs/hr): 97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 19,980

MAGLC (ug/m³): 20,000

Pollutant: 2-Butoxyethanol

TLV (ug/m³): 120,120

Maximum Hourly Emission Rate (lbs/hr): 13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,680

MAGLC (ug/m³): 2,860

Pollutant: n-Heptane and Isomers

TLV (ug/m³): 349,860

Maximum Hourly Emission Rate (lbs/hr): 40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 8,230

MAGLC (ug/m³): 8,330

Pollutant: Dipropylene Glycol Methyl Ether

TLV (ug/m³): 600,180

Date: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14,010

MAGLC (ug/m³): 14,290

Pollutant: Methyl Alcohol

TLV (ug/m³) 200,000

Maximum Hourly Emission Rate (lbs/hr): 23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4,740

MAGLC (ug/m³): 4,760

Pollutant: Isopropyl Alcohol

TLV (ug/m³): 980,000

Maximum Hourly Emission Rate (lbs/hr): 113

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,270

MAGLC (ug/m³): 23,330

Pollutant: n-Propyl Alcohol

TLV (ug/m³): 500,000

Maximum Hourly Emission Rate (lbs/hr): 56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 11,530

MAGLC (ug/m³): 11,900

Pollutant: Stoddard Solvent

TLV (ug/m³): 525,000

Buckeye Packaging Comp IncPTI Application: **15-1216****Date:**Facility ID: **1576011509**Emissions Unit ID: **K006**

Maximum Hourly Emission Rate (lbs/hr): 60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12,360

MAGLC (ug/m3) 12,500

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 the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used or use of new materials that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials used or use of new materials that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned changes as a "modification" requiring a permit to install if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

Bucke

PTI A₁

Emissions Unit ID: **K006**

Date: To be entered upon final issuance

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Bucke

PTI A₁Emissions Unit ID: **K007****Date: To be entered upon final issuance****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****A. Applicable Emissions Limitations and/or Control Requirements**

- 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>
1-6 color flexographic printing press used to print on polyethylene; Buckeye Flexographic Press #7	OAC rule 3745-31-05	OC Limit: 100 lbs/hr 55.2 tons/year
(MODIFICATION)	OAC rule 3745-21-09(Y)	<p>The combined emissions of OC from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons per year, based upon a rolling, 365-day summation of the daily emissions. see section 2.a. below.</p> <p>The total water-based ink usage for emissions units K001, K003, K004, K005, K006, and K007 shall consist of at least 75% of the overall ink usage on a monthly basis. See section 2.b. below.</p> <p>Any printing line which is located at a facility in which the total maximum usage of coatings and inks in all flexographic, packaging</p>

Buckeye Packaging Comp Inc

PTI Application: **15-1316**

Date:

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rotogravure and publication
rotogravure printing lines is less
than or equal to 148 tons/year
is exempt from this rule.

Date: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** This allowable includes any solvent used to make the ink press ready and for press parts and worker cleanup. The permittee has existing records (from the past year) which demonstrate compliance with the restricted OC emissions of this PTI therefore month-to-month limitations are not needed for the first 12 months after issuance of this permit.
- 2.b** A water-based ink shall be defined as an ink in which the organic compound content of the volatile matter is less than 25% of the total volume of the volatile matter in the ink (prior to the addition of any thinning solvents). Compliance with this term shall be determined by calculating the gallons (prior to the addition of any thinning solvents) of the solvent-based ink used per month as a percentage of the sum of the gallons of solvent-based inks (prior to the addition of any thinning solvents) and the gallons of water-based ink (prior to the addition of any solvents) per month .

B. Operational Restrictions

1. None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions units K001, K003, K004, K005, K006, and K007 (records do not have to be maintained for individual presses):
 - a. the company identification for each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - b. the number of gallons of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - c. the organic compound content of each ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity employed;
 - d. the water content of any ink employed (prior to the addition of any thinning solvents);

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- e. the total OC emissions from all ink, cleanup solvent, initial thinning solvent (used to get the ink press ready), and solvent added to maintain viscosity, in pounds or tons;
- f. a calculation of the percentage of inks employed which are water-based inks (see section A.2.b.); and,
- g. the total tons of ink used. (This shall include any initial thinning solvents, including water, used to get the ink press ready. It shall not include any solvents used to maintain viscosity.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 365-day emission limitation for OC;
 - b. an identification of each month which showed a violation of the limit that no more than 25% of the gallons of inks employed can be solvent-based inks and the actual percentage of solvent-based inks employed for each such month; and,
 - c. an identification of any year in which the annual ink usage exceeds a total of 148 tons from all emissions units at this facility. This ink usage shall include any initial thinning solvents, including water, used to make the ink press ready. It shall not include any solvents used to maintain viscosity.
2. The permittee shall submit an annual report which specifies the total organic compound emissions rate from emissions units K001, K003, K004, K005, K006, & K007 for each month of the previous calendar year. The permittee shall also submit an annual report which specifies the tons of ink and coatings employed at this facility in all flexographic, packaging rotogravure and publication rotogravure printing lines during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

Buckeye Packaging Comp Inc

PTI Application: **15-1216**

Date:

Facility ID: **1576011509**

Emissions Unit ID: **K007**

100 lbs OC/hour

Applicable Compliance Method:

This limit was based on a one-time calculation of the maximum emissions that can be generated by this emissions unit.

b. Emission Limitation:

55.2 tons OC/yr

Buckeye Packaging Comp Inc

PTI Application: 15-1234

Date:

Facility ID: 1576011509

Emissions Unit ID: **K007**

Applicable Compliance Method:

K001, K003, K004, K005, K006, and K007 are limited to a total of 55.2 tons OC emissions per year. Compliance with this limit will ensure compliance with the 55.2 tons OC/yr limit for K007.

c. Emission Limitation:

Requirement that at least 75% of the inks used in emissions units K001, K003, K004, K005, K006, and K007 be water-based inks.

Applicable Compliance Method:

Recordkeeping

d. Emission Limitation:

The total OC emissions from emissions units K001, K003, K004, K005, K006, and K007 shall not exceed 55.2 tons/year, based upon a rolling, 365-day summation of the OC emissions.

Applicable Compliance Method:

Recordkeeping

F. Miscellaneous Requirements

1. This emissions unit was part of permit to install 15-1234 which was originally issued on July 3, 1996. This permit to install supersedes the requirements of PTI 15-1234.
2. This permit allows the use of material specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was established using the Ohio EPA's "Air Toxic Policy" and is based on both materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Date: To be entered upon final issuance

Pollutant: Isopropyl Acetate

TLV (ug/m³): 950,040

Maximum Hourly Emission Rate (lbs/hr): 109.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 22,550

MAGLC (ug/m³): 22,620

Pollutant: n-Propyl Acetate

TLV (ug/m³): 840,000

Maximum Hourly Emission Rate (lbs/hr): 97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 19,980

MAGLC (ug/m³): 20,000

Pollutant: 2-Butoxyethanol

TLV (ug/m³): 120,120

Maximum Hourly Emission Rate (lbs/hr): 13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,680

MAGLC (ug/m³): 2,860

Pollutant: n-Heptane and Isomers

TLV (ug/m³): 349,860

Maximum Hourly Emission Rate (lbs/hr): 40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 8,230

MAGLC (ug/m³): 8,330

Date: To be entered upon final issuance

Pollutant: Dipropylene Glycol Methyl Ether

TLV (ug/m³): 600,180

Maximum Hourly Emission Rate (lbs/hr): 68

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14,010

MAGLC (ug/m³): 14,290

Pollutant: Methyl Alcohol

TLV (ug/m³) 200,000

Maximum Hourly Emission Rate (lbs/hr): 23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4,740

MAGLC (ug/m³): 4,760

Pollutant: Isopropyl Alcohol

TLV (ug/m³): 980,000

Maximum Hourly Emission Rate (lbs/hr): 113

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 23,270

MAGLC (ug/m³): 23,330

Pollutant: n-Propyl Alcohol

TLV (ug/m³): 500,000

Maximum Hourly Emission Rate (lbs/hr): 56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 11,530

Date: To be entered upon final issuance

MAGLC (ug/m³): 11,900

Pollutant: Stoddard Solvent

TLV (ug/m³): 525,000

Maximum Hourly Emission Rate (lbs/hr): 60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 12,360

MAGLC (ug/m³) 12,500

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 the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials) or the use of new materials that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used or use of new materials that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials used or use of new materials that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned changes as a "modification" requiring a permit to install if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

Buckeye Packaging Comp Inc

PTI Application: **15-1216**

Date:

Facility ID: **1576011509**

Emissions Unit ID: **K007**

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.