

Additional Terms and Conditions

Facility-Wide Restrictions

A. Operational Restrictions

1. The combined annual emissions from the entire facility (K001 and K004 - K019) shall not exceed the following as rolling, 12-month summations:

97.6 tons of volatile organic compounds (VOC);
24.0 tons of all hazardous air pollutants (HAP);

and

9.0 tons of any individual HAP.

2. The potential emissions [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of VOC (tons)</u>	<u>Maximum Allowable Cumulative Emissions of Each HAP (tons)</u>	<u>Maximum Allowable Cumulative Emissions Combined HAP (tons)</u>
1	23.75	2.25	6.0
1-2	23.75	2.25	6.0
1-3	23.75	2.25	6.0
1-4	47.50	4.50	12.0
1-5	47.50	4.50	12.0
1-6	47.50	4.50	12.0
1-7	71.25	6.75	18.0
1-8	71.25	6.75	18.0
1-9	71.25	6.75	18.0
1-10	97.60	9.00	24.0
1-11	97.60	9.00	24.0
1-12	97.60	9.00	24.0

4. After the first 12 calendar months of operation following the issuance of

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this permit, compliance with the facility-wide VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable combined annual emission limitations, in tons.

B. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K004 - K019:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material, as applied;

c. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (c));

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (g));

i. the number of gallons of each cleanup material employed;

j.the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials);

k.the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup material);

l.the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials);

m.the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (l) for the previous 12 calendar months);

n.the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (j) for the previous 12 calendar months); and

o.the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year (the sum of (k) for the previous 12 calendar months).

C. Reporting Requirements

1.The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

2.The permittee shall submit required reports in the following manner:

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a. Reports of any required monitoring and/or record keeping 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 record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for K001 and K004 - K019.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

D. Testing Requirements

1. Compliance with the facility-wide emission limitations in Permit to Install #16-1844 shall be determined in accordance with the following methods:

a. Emission Limitation:

97.6 TPY VOC for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total VOC emission rate for all

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coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation:

24 TPY of all HAPs for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly total HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the

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permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

c. Emission Limitation:

9.0 TPY of any individual HAP for entire facility

Applicable Compliance Method:

Monthly records shall be maintained of the HAP content for each individual HAP of all coatings and cleanup materials employed, the monthly usage of all coatings and cleanup materials employed, and the calculated monthly individual HAP emission rate for all coatings and cleanup materials employed in this facility. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

E. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 16-1844. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the estimated emission rates provided in the permit application for the following chemicals: n-hexane, hexane isomers, ethanol, isopropanol, heptane, methyl ethyl ketone, ethylbenzene, xylene, ammonia, and propylene glycol monomethyl ether were used to demonstrate compliance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: n-hexane

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.95

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 784

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4,190

Pollutant: ammonia

TLV (mg/m3): 17

Maximum Hourly Emission Rate (lbs/hr): 0.08

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 68

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 405

Pollutant: hexane isomers

TLV (mg/m3): 1,760

Maximum Hourly Emission Rate (lbs/hr): 1.89

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1,560

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Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 41,905

Pollutant: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 1.43

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 1,172**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44,762

Pollutant: isopropanol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 8.5

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 2,396**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,405

Pollutant: heptane

TLV (mg/m3): 1,640

Maximum Hourly Emission Rate (lbs/hr): 14.73

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 12,162**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 39,048

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 3.35

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 2,762**

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,048

Pollutant: ethylbenzene

TLV (mg/m3): 176

Maximum Hourly Emission Rate (lbs/hr): 0.04

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**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 32
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333**

Pollutant: xylene

**TLV (mg/m3): 1,760
Maximum Hourly Emission Rate (lbs/hr): 0.20
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 164
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333**

Pollutant: propylene glycol monomethyl ether

**TLV (mg/m3): 1,880
Maximum Hourly Emission Rate (lbs/hr): 0.013
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline
(ug/m3): 9
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8,786**

2.As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

a.any changes in the composition of the coatings and cleanup materials, or the use of new coatings and cleanup 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.any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);

c.any change in the composition of the coatings and cleanup materials, or use of new coatings and cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

d.any change in the composition of the coatings and cleanup materials, or use of new coatings and cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).

3.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 permit to install prior to the change.

Restrictions For Sources K001, K004, K006, K008, K010, K012, K016, and K018

A. Operational Restrictions

1.The permittee shall not permit the use of coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

B. Monitoring and/or Record Keeping Requirements

1.The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a.the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the total number of hours the emissions unit was in operation; and

e. the average hourly VOC emission rate for all coatings and cleanup materials, in pounds per hour (average).

C. Reporting Requirements

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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 use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2.The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3.The permittee shall submit required reports in the following manner:

- a. reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency; and
- b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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.).

D. Testing Requirements

1.Compliance with the emission limitations in Permit to Install #16-1844 shall be determined in accordance with the following methods:

- a. Emission Limitation:

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3.5 lbs/hour VOC

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Restrictions For Sources K005, K007, K009, K011, K013, K014, K015, K017, and K019

A. Operational Restrictions

1. The maximum daily tab lubricant usage for this emissions unit shall not exceed 3.0 gallons.

B. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records, on a monthly basis, that contain the following information for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total VOC content, in pounds of VOC per gallon, excluding water and exempt solvents of each coating and cleanup material employed;

d. the number of hours the emissions unit was in operation; and

e. the average VOC emission rates from all coatings and cleanup materials employed, in pounds per hour (average).

C. 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 an exceedance of the daily coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the average hourly mass emission limitation for VOC, and the actual VOC emissions for each such period.

3. The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the 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

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control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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.).

D. Testing Requirements

1. Compliance with the emission limitations in Permit to Install #16-1844 shall be determined in accordance with the following methods:

a. Emission Limitation:

2.0 lbs/hr VOC
3.75 lbs/hr VOC (K014)

Applicable Compliance Method:

Daily records shall be maintained of the VOC contents of all coatings and cleanup materials employed, the daily usage of all coatings and cleanup materials employed, and the calculated average hourly VOC emission rate for all coatings and cleanup materials employed in this emissions unit. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B) and OAC rule 3745-21-04(B)(5). The VOC content of each coating shall be

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determined using USEPA Methods 24 and 24A. If pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.