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Facility Name: **Phoenix Packaging Corporation**

Application Number: **16-1844**

Date: **March 24, 1999**

#### **GENERAL PERMIT CONDITIONS**

#### **TERMINATION OF PERMIT TO INSTALL**

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

#### **NOTICE OF INSPECTION**

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

#### **CONSTRUCTION OF NEW SOURCES**

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

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

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

### **PERMIT TO INSTALL FEE**

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

### **PUBLIC DISCLOSURE**

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

### **APPLICABILITY**

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

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### **BEST AVAILABLE TECHNOLOGY**

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

### **PERMIT TO OPERATE APPLICATION**

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

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

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

Cont'd

Ohio EPA Source Number	K006 (Mod)	K009 (Mod)	K012 (Mod)	K016 (new)
K001 (Mod)				
	K006 (Mod) Cont'd	K010 (Mod)	K013 (Mod)	K016 (new) Cont'd
K004 (Mod)	K007 (Mod)			K017 (new)
			K014 (Mod)	
		K011 (Mod)		
K005 (Mod)	K008 (Mod)			K018 (new)
		K011 (Mod)	K015 (new)	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		coating line		
K019 (new)	Source Identification Description	Conversion press 3 - tab press, score line press	Blanked end liner 7 - 2 and 3 piece can end surface coating line	Conversion press 6 - tab press, score line press
	Blanked end liner 1 - 2 and 3 piece can end surface coating line	Blanked end liner 4 - 2 and 3 piece can end surface coating line	Conversion press 7 - tab press, score line press	Blanked end liner 8 - 2 and 3 piece can end surface coating line
	Blanked end liner 2 - 2 and 3 piece can end surface coating line	Conversion press 4 - tab press, score line press	Post end repair station - flash-off oven, can end surface coating line	Conversion press 8 - tab press, score line press
	Conversion press 2 - tab press, score line press	Blanked end liner 5 - 2 and 3 piece can end surface coating line	Conversion press 1 - tab press, score line press	
	Blanked end liner 3 - 2 and 3 piece can end surface	Conversion press 5 - tab press, score line press	Blanked end liner 6 - 2 and 3 piece can end surface coating line	



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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	3745-31-05		3745-21-09 (U)	
Applicable Federal & OAC Rules	3745-21-09 (D)	3745-31-05	3745-31-05	Permit Allowable Mass Emissions and/or Control/Usage Requirements
3745-31-05	3745-31-05	3745-21-09 (U)	3745-21-09 (D)	3.5 pounds/hour VOC 3.7 pounds VOC per gallon coating, minus water and exempt solvents 15.3 TPY VOC
3745-21-09 (D)	3745-21-09 (U)	3745-31-05	3745-31-05	3.5 pounds/hour VOC 3.7 pounds VOC per gallon coating, minus water and exempt solvents 15.3 TPY VOC
	3745-31-05		3745-21-09 (U)	3.5 pounds/hour VOC 3.7 pounds VOC per gallon coating, minus water and exempt solvents 15.3 TPY VOC
3745-31-05	3745-21-09 (D)	3745-31-05	3745-31-05	2.0 pounds/hour VOC
3745-21-09 (D)		3745-21-09 (U)	3745-21-09 (D)	3.0 gallons/ day coating
	3745-31-05		3745-21-09 (U)	8.76 TPY VOC
3745-31-05	3745-21-09 (U)	3745-31-05	3745-31-05	3.5 pounds/hour VOC 3.7 pounds VOC per gallon coating, minus water and exempt solvents 15.3 TPY VOC
3745-21-09 (U)	3745-31-05		3745-21-09 (U)	
3745-21-09 (U)	3745-21-09 (D)	3745-31-05		

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	gallons/day coating	15.3 TPY VOC		
2.0 pounds/hour VOC	8.76 TPY VOC	2.0 pounds/hour VOC		3.7 pounds VOC per gallon coating, minus water and exempt solvents
	3.5 pounds/hour VOC	3.0 gallons/day coating		15.3 TPY VOC
3.0 gallons/day coating	3.7 pounds VOC per gallon coating,	8.76 TPY VOC		2.0 pounds/hour VOC
8.76 TPY VOC	minus water and exempt solvents	3.75 pounds/hour VOC		3.0 gallons/day coating
3.5 pounds/hour VOC	15.3 TPY VOC	3.0 gallons/day coating		8.76 TPY VOC
3.7 pounds VOC per gallon coating, minus water and exempt solvents	2.0 pounds/hour VOC	16.4 TPY VOC		
15.3 TPY VOC	3.0 gallons/day coating	2.0 pounds/hour VOC		
2.0 pounds/hour VOC	8.76 TPY VOC	3.0 gallons/day coating		
	3.0 gallons/day coating	8.76 TPY VOC		
	8.76 TPY VOC	3.5 pounds/hour VOC		
	3.5 pounds/hour VOC	3.7 pounds VOC per gallon coating, minus water and exempt solvents		
	3.0 gallons/day coating	15.3 TPY VOC		
	2.0 pounds/hour VOC	2.0 pounds/hour VOC		
	3.7 pounds VOC per gallon coating,	3.0 gallons/day coating		
	minus water and exempt solvents	8.76 TPY VOC		
3		3.5 pounds/hour VOC		

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SUMMARY  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	97.6
Individual HAP	9.0
Combined HAP	24.0

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, OH 44308.**

**WASTE DISPOSAL**

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

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#### **MAINTENANCE OF EQUIPMENT**

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

#### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, OH 44308.**

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

#### **AIR POLLUTION NUISANCES PROHIBITED**

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

#### **NINETY DAY OPERATING PERIOD**

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

#### **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

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be provided to Ohio EPA upon completion of construction but prior to startup of the source.

### ADDITIONAL SPECIAL TERMS AND CONDITIONS

#### **I. 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 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.

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5. The permittee shall not operate emission units K002 and K003.

**B. Monitoring and/or Recordkeeping 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

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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);
- p. the total number of can ends produced for the entire facility, in millions of can ends per month; and,
- q. the rolling, 12-month summation of the number of can ends produced for the entire facility (the sum of (p) 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:
  - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Akron Air Pollution Control; and,

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- 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 Akron Air Pollution Control. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that 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 No. 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 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

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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 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

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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 to Install shall supersede all the air pollution control requirements for these emissions units previously contained in Permit to Install 16-1733, as issued on February 11, 1998.
2. 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, hapten, 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/m<sup>3</sup>): 176**

**Maximum Hourly Emission Rate (lbs/hr): 0.95**

**Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m<sup>3</sup>): 784**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4,190**

**Pollutant: ammonia**

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**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**

**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**

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**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  
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**

3. 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 Akron

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Air Pollution Control:

- 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

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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).
4. 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.

## **II. 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 Recordkeeping 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).

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### **C. Reporting Requirements**

1. The permittee shall notify the Director (the Akron Air Pollution Control) 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 Akron Air Pollution Control) 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 recordkeeping information shall be submitted to the Akron Air Pollution Control; 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 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 Akron Air Pollution Control. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that 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 No. 16-1844 shall be determined in accordance with the following methods:
  - a. Emission Limitation

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

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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.

**III. 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 Recordkeeping Requirements**

1. The permittee shall maintain daily records, for each month, 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,

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- 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 Akron Air Pollution Control) 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 Akron Air Pollution Control) 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 recordkeeping information shall be submitted to the Akron Air Pollution Control; 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 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 Akron Air Pollution Control. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that 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 No. 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)

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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.

**E.** This Permit to Install shall supersede PTI No. 16-1733.