



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
FRANKLIN COUNTY**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08059

DATE: 2/2/00

GrafX Packaging Corp
John Hewer
6380 West Canal St
Canal Winchester, OH 43110

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

CDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 2/2/00

FINAL PERMIT TO INSTALL 01-08059

Application Number: 01-08059
APS Premise Number: 0125032422
Permit Fee: **\$800**
Name of Facility: Grafx Packaging Corp
Person to Contact: John Hewer
Address: 6380 West Canal St
Canal Winchester, OH 43110

Location of proposed air contaminant source(s) [emissions unit(s)]:

**6380 West Canal St
Canal Winchester, Ohio**

Description of proposed emissions unit(s):

5 color flexographic printing press with rotary die cutter flexographic printing press for imprinting images onto paper and paperboard substrates Martin model DRO 1628 with rotary die cutter.

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

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

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

14. Construction Compliance Certification

GrafX Packaging Corp
PTI Application: 01-08059
Issued: 2/2/00

Facility ID: 0125032422

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/VOC	54.8
Ammonia	9.0

PART II: SPECIAL TERMS AND CONDITIONS

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>
Five-color flexographic sheet-fed printing press (cold-set) w/rotary die cutter	OAC rule 3745-31-05	Volatile organic compound emissions shall not exceed 10.8 pounds per hour excluding cleanup and 47.6 tons per year including cleanup. See A.2.a., B.1., and B.2.below.
	OAC rule 3745-21-09(Y)(1)(a)	Ammonia emissions shall not exceed 1.8 pounds per hour and 7.8 tons per year. See F.1. below.
		The percent by volume limitation of this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05. See B.1. below.

2. Additional Terms and Conditions

- 2.a The 10.8 lbs/hr limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

- 1. The volatile organic compound content of the ink, as applied, shall not exceed 0.30 lbs VOC/gallon and 1.6 percent by volume of ink, excluding water.

8

Grafx

PTI A

Issued: 2/2/00

Emissions Unit ID: **K001**

2. The permittee shall employ water for ink and press clean-up material.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the printing operation for the purposes of determining compliance with the annual limit:
 - a. The company identification for each ink solution.
 - b. The volatile content of each ink solution in percent by volume, as applied.
 - c. The number of gallons of each ink solution employed.
 - d. The organic compound content of each ink solution, in pounds per gallon, excluding water.
 - e. The total organic compound emission rate for all ink solutions, in pounds per month, the sum of © x d) of each ink solution, respectively.
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Central District Office in writing of any monthly record showing the use of noncomplying coatings, inks or cleanup materials. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for 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-
Volatile organic compound emissions shall not exceed 10.8 pounds per hour.

Applicable Compliance Method-

Compliance with the 10.8 lb/hr emission limitation shall be determined according to the following equation:

$$E_{voc} = Q_i * D_{voci}$$

Where

E_{voc} = volatile organic compound emissions in lbs/hr

Q_i = maximum hourly ink usage (36.3 gallons)

D_{voci} = Maximum density of ink: lb VOC /gallon of ink,(0.21 lb VOC/gallon)

The value in the equation is based on ink organic compound content restrictions in B.1. VOC content from MSDS sheets are lower than the restriction.

b. Emissions Limitation-

The annual VOC emissions shall not exceed 47.6 tons volatile organic compounds per year for emissions unit K001.

Applicable Compliance Method-

Compliance with the ton per year emission limitation shall be demonstrated through the summation of monthly records required pursuant to Section C.1.

c. Emission Limitation-

Ammonia emissions shall not exceed 1.8 pounds per hour.

Applicable Compliance Method-

Compliance with the 1.8 lb/hr emission limitation shall be determined according to the following equation:

Q_c = maximum hourly ink usage (36.3 gallons)

D_{coat} = density of coating (10.01 lb/gallon)

Percent NH_4OH by weight (0.01)

Mole Fraction NH_3 (0.49)

$$36.3 \text{ gal/hr} * 10.01 \text{ lb/gal} * 0.01 * 0.49 = 1.8 \text{ lb } NH_3/\text{hr}$$

d. Emission Limitation-

Ammonia emissions shall not exceed 7.8 tons per year.

Applicable Compliance Method-
 Compliance with the 7.8 ton/yr emission limitation shall be determined according to the following equation:

Q_c = maximum annual ink usage (318,000 gallons)

D_{coat} = density of coating (10.01 lb/gallon)

Percent NH₄OH by weight (0.01)

Mole Fraction NH₃ (0.49)

$$318,000 \text{ gal/yr} * 10.01 \text{ lb/gal} * 0.01 * 0.49 = 7.8 \text{ ton NH}_3/\text{yr}$$

- U.S. EPA Method 24 or 24A shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating and cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. Note: The Method 24 data may be supplied by the manufacturer of the coatings and cleanup materials.

F. Miscellaneous Requirements

- This permit allows the use of materials (typically coatings and cleanup materials) 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 (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the 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: Ammonia

TLV (ug/m³): 17,000

Maximum Hourly Emission Rate (lbs/hr): 1.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 454 @ 300 meters

MAGLC (ug/m³): 571

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 the 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, 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 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 either would 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.

14

GrafX Packaging Corp
PTI Application: 01 09050
Issued

Facility ID: 0125032422

Emissions Unit ID: K001

PART II: SPECIAL TERMS AND CONDITIONS [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>
Six-color off-set sheet-fed lithographic printing press and coater w/common infrared drier	OAC rule 3745-31-05 OAC rule 3745-21-07(G)(1)	The organic compound emissions shall not exceed 1.6 pound per hour and 7.2 ton per year. See B.1. and B.2. below. Ammonia emissions shall not exceed 0.28 lb/hr and 1.2 ton per year. See F.1. below. The hourly and daily organic compound limitation of this rule are less stringent than the limitation established pursuant to OAC rule 3745-31-05. See A.2.a., B.1. and B.2. below.

2. **Additional Terms and Conditions**

- 2.a The 1.6 lb/hr limitation was established for PTI purposes to reflect the potential to emit for the sheet-fed lithographic printing press and coater. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The volatile organic compound content of the lithographic ink shall not exceed 0.30 lbs OC/gallon of lithographic ink as applied, excluding water and exempt solvents.

2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

3. The permittee shall employ water for ink and press clean-up material.
4. The permittee shall employ an ammonium hydroxide solvent in the IR cured coating with no volatile organic compound content.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the printing operation:
 - a. The company identification for each ink and coating material employed.
 - b. The number of gallons of each ink and coating material employed.
 - c. The organic compound content of each ink and coating material, in pounds per gallon.
 - d. The organic compound emission rate for each ink and coating material, in pounds per month, i.e., $b \times c$, for each ink and coating material, respectively.
 - e. The total organic compound emission rate for all inks and coating material, in pounds per month, the sum $\sum (b \times c)$ of each ink and coating material.
2. The permittee shall collect and record the following information each month:
 - a. the company identification of each solvent employed in this emissions unit, and
 - b. whether or not each solvent is a photochemically reactive material.

D. Reporting Requirements

1. The permittee shall notify the Central District Office in writing of any monthly record showing that the VOC content exceeds the applicable restriction in B.1. or B.2. The notification shall include a copy of such record and shall be sent to the Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material, and the estimated total quantity of material emitted during each such day, in pounds. Each report shall be submitted to the Central District Office within 30 days of the deviation.

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-
Organic compound emissions shall not exceed 1.6 pound per hour from the lithographic press.

Applicable Compliance Method-
Compliance with the 1.6 lb OC/hr emission limitation shall be determined according to the following equation:

$$E_{voc} = (Q_i * D_{voci}) + (Q_c * D_{vocc})$$

Where
 E = volatile organic compound emissions in lb/hr
 Q_i = maximum hourly lithographic usage (2.6 gallons)
 D_{voci} = density in pounds organic compounds per gallon of ink (0.30 lb/gallon*)
 Q_c = maximum hourly coating usage (5.6 gallons)
 D_{vocc} = density in pounds organic compounds per gallon of ink (0.15 lb/gallon*)

*These values are based on the coating and ink content restrictions. Actual VOC content from MSDS sheets are less than the restriction.

- b. Emissions Limitation-
 The annual VOC emissions shall not exceed 7.2 ton per year for emissions unit K002.
- Applicable Compliance Method-
 Compliance with the 7.2 ton per year emission limitation shall be demonstrated through the summation of monthly records required pursuant to Section C.1.
- c. Emission Limitation-
 Ammonia emissions shall not exceed 0.26 pound per hour from the coater
- Applicable Compliance Method-
 Compliance with the 0.26 lb ammonia/hr emission limitation shall be determined according to the following equation:
- Qc = maximum hourly coating usage (5.6 gallons)
 Dcoat = density of coating (9.34 lb/gallon)
 Percent NH4OH by weight (0.01)
 Mole Fraction NH3 (0.49)
- $$5.6 \text{ gal/hr} * 9.34 \text{ lb/gal} * 0.01 * 0.49 = 0.256 \text{ lb NH}_3/\text{hr}$$
- b. Emissions Limitation-
 The annual ammonia emissions shall not exceed 1.2 ton per year for emissions unit K002.
- Applicable Compliance Method-
 Qc = maximum annual coating usage (49,056 gallons)
 Dcoat = density of coating (9.34 lb/gallon)
 Percent NH4OH by weight (0.01)
 Mole Fraction NH3 (0.49)
- $$49,056 \text{ gal/yr} * 9.34 \text{ lb/gal} * 0.01 * 0.49 = 1.2 \text{ ton NH}_3/\text{hr}$$
2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) 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 (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the 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: Ammonia

TLV (ug/m3): 17,000

Maximum Hourly Emission Rate (lbs/hr): 0.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.2

MAGLC (ug/m3): 571

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 the 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, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

GrafX Packaging Corp
PTI Application: 01-09050
Issued

Facility ID: 0125032422

Emissions Unit ID: K002

The Ohio EPA will not consider any of the above-mentioned 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 either would 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.