



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

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

8/25/2009

Brent Bowers
SONOCO PHOENIX INC - Brookline Plant
3075 Brookline Rd. NW
North Canton, OH 44720

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677000223
Permit Number: P0105199
Permit Type: OAC Chapter 3745-31 Modification
County: Summit

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

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

Cc: ARAQMD

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



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

FINAL

**Air Pollution Permit-to-Install and Operate
for
SONOCO PHOENIX INC - Brookline Plant**

Facility ID: 1677000223
Permit Number: P0105199
Permit Type: OAC Chapter 3745-31 Modification
Issued: 8/25/2009
Effective: 8/25/2009
Expiration: 11/6/2013



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
 for
 SONOCO PHOENIX INC - Brookline Plant

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

 2. Who is responsible for complying with this permit? 4

 3. What records must I keep under this permit? 4

 4. What are my permit fees and when do I pay them?..... 4

 5. When does my PTIO expire, and when do I need to submit my renewal application? 4

 6. What happens to this permit if my project is delayed or I do not install or modify my source? 5

 7. What reports must I submit under this permit? 5

 8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5

 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5

 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 5

 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6

 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6

 13. Can I transfer this permit to a new owner or operator? 6

 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7

 15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 14

 1. K016, Blanked End Liner 106..... 15

 2. K017, Conversion Press 106..... 22



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0105199
Facility ID: 1677000223
Effective Date: 8/25/2009

Authorization

Facility ID: 1677000223
Application Number(s): A0037962
Permit Number: P0105199
Permit Description: Chapter 31 modification to increase maximum production rate and resulting allowable VOC emissions from emissions units K016 and K017. The plant-wide limit for VOC emissions will also increase from 95.95 to 97.15 tons per year.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00
Issue Date: 8/25/2009
Effective Date: 8/25/2009
Expiration Date: 11/6/2013
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SONOCO PHOENIX INC - Brookline Plant
3075 BROOKLINE ROAD, N.W.
NORTH CANTON, OH 44720

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

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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0105199
Facility ID: 1677000223
Effective Date: 8/25/2009

Authorization (continued)

Permit Number: P0105199
Permit Description: Chapter 31 modification to increase maximum production rate and resulting allowable VOC emissions from emissions units K016 and K017. The plant-wide limit for VOC emissions will also increase from 95.95 to 97.15 tons per year.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	K016
Company Equipment ID:	Blanked End Liner 106
Superseded Permit Number:	P0104057
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K017
Company Equipment ID:	Conversion Press 106
Superseded Permit Number:	P0104057
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105199

Facility ID: 1677000223

Effective Date: 8/25/2009

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with



OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105199

Facility ID: 1677000223

Effective Date: 8/25/2009

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105199

Facility ID: 1677000223

Effective Date: 8/25/2009

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 1.c), 1.d)(1), 1.d)(2), 1.d)(3), 1.e), and 1.f).
 - c) The emissions of any individual Hazardous Air Pollutant (HAP), total combined HAPs, and VOC from emissions units K001, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, and K027, combined, shall not exceed 9.0 tons per year, 24.0 tons per year, and 97.44 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions.
 - d) In order to determine compliance with the facility-wide emission limitations in 1.c) above, the permittee shall maintain monthly records of the following information for emissions units K001, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, and K027, combined:
 - (1) The permittee shall collect and record the following information each month for all materials containing any HAP¹ and/or VOC that are applied in the uncontrolled emissions units K001, K004, K005, K006, K007, K008, K009, K010, K011, K013, K015, K017, K019, K024, K025, and K026, combined:
 - a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP and/or VOC;
 - b. the VOC content of each VOC containing material applied (and identified in "a" above) in pound(s) of VOC per gallon of each VOC containing material applied or weight fraction of VOC contained in each material applied;
 - c. the name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per gallon of each HAP-containing material applied or the weight fraction of each individual HAP contained in each material applied;
 - d. the number of gallons or pounds of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - e. the VOC emissions from all the materials employed, in ton(s), i.e., the summation of the products of "b" times "d" for all materials applied during the month, divided by 2,000 pounds per ton;
 - f. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "c" times



Ad@ for all the materials applied during the month, divided by 2,000 pounds per ton; and

- g. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from Af@ above.

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- (2) The permittee shall collect and record the following information each month for all materials containing any HAP¹ and/or VOC that are applied in each controlled emissions units K012, K016, K018, K020, K021, K022, K023, and K027:

- a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP and/or VOC;
- b. the VOC content of each VOC containing material applied (and identified in "a" above) in pound(s) of VOC per gallon of each VOC containing material applied or weight fraction of VOC contained in each material applied;
- c. the name/identification of each individual HAP contained in each material applied (and identified in Aa@ above) and the pound(s) of each HAP per gallon of each HAP-containing material applied or the weight fraction of each individual HAP contained in each material applied;
- d. the number of gallons or pounds of each coating, thinner, additive, cleanup material, and other material applied during the month;
- e. the uncontrolled VOC emissions from all the materials employed, in ton(s) for each emissions unit, i.e., the summation of the products of "b" times "d" for all materials applied during the month, divided by 2,000 pounds per ton;
- f. for each individual HAP, the total uncontrolled emissions from all the materials employed, in ton(s) for each emissions unit, i.e., for each individual HAP, the summation of the products of Ac@ times Ad@ for all the materials applied during the month, divided by 2,000 pounds;
- g. the total uncontrolled combined HAPs emissions from all the materials employed during the month for each emissions unit, in ton(s), i.e., the summation of all the individual HAPs emissions from Af@ above;
- h. the calculated, controlled VOC emission rate for all the materials employed, in ton(s) for each emissions unit, i.e., the uncontrolled VOC emission rate, calculated in Ae@ above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;
- i. for each individual HAP, the calculated, controlled emission rate from all the materials employed, in ton(s) for each emissions unit, i.e., the total uncontrolled



individual HAP emission rate calculated in Af@ above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;

- j. the calculated, controlled combined HAPs emission rate for all the materials employed, in ton(s) for each emissions unit, i.e., the uncontrolled total combined HAPs emission rate, calculated in Ag@ above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;
- k. the calculated, controlled VOC emission rate for all the materials employed, in ton(s) for all controlled emissions units (K012, K016, K018, K020, K021, K022, K023, and K027), i.e., the summation of the VOC emissions from all emissions units in "h" above;
- l. for each individual HAP, the calculated, controlled emission rate from all the materials employed, in ton(s) for all controlled emissions units (K012, K016, K018, K020, K021, K022, K023, and K027), i.e., the summation of each individual HAP emissions from all emissions units in "i" above; and
- m. the calculated, controlled combined HAPs emission rate for all the materials employed, in ton(s) for all controlled emissions units (K012, K016, K018, K020, K021, K022, K023, and K027), i.e., the summation of the total combined HAPs emissions from all emissions units in "j" above.

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

- (3) The permittee shall collect and record the following information each month for the entire facility (emissions units K001, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, and K027, combined):
 - a. the VOC emissions from all the materials employed, in ton(s), i.e., [d](1)e. + d)(2)k.];;
 - b. for each individual HAP, the total emissions from all the materials employed, in ton(s), for each individual HAP, i.e., [d](1)f. + d)(2)l.] for each individual HAP;
 - c. the total combined HAPs emissions from all materials employed, in ton(s), i.e., [d](1)g. + d)(1)m.];
 - d. the VOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in Aa@ above, for the present month plus the previous 11 months of operation, in ton(s);
 - e. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in Ab@ above, for the present month plus the previous 11 months of operation, in ton(s); and



- f. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in Ac@ above, for the present month plus the previous 11 months of operation, in ton(s).
- e) The permittee shall submit quarterly deviation (excursion) reports that identify:
- (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - a. all exceedances of the rolling, 12-month VOC emission limitation;
 - b. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP; and
 - c. all exceedances of the rolling, 12-month total combined HAPs emission limitation.
 - (2) the probable cause of each deviation (excursion);
 - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - (4) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- f) Compliance with the emission limitation(s) in 1.c) above shall be determined in accordance with the following method(s):
- (1) Emission Limitations:

 The emissions of any individual Hazardous Air Pollutant (HAP), total combined HAPs, and VOC from emissions units K001, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, and K027, combined, shall not exceed 9.0 tons per year, 24.0 tons per year, and 97.44 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual emission limitations above shall be demonstrated based on record keeping requirements established in 1.d)(1), 1.d)(2), and 1.d)(3) above.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105199

Facility ID: 1677000223

Effective Date: 8/25/2009

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings, thinner, additive, cleanup material, and any other material containing any VOC. Formulation data shall be used to determine the HAP contents of the coating, thinner, additive, cleanup material, and any other material containing any HAP.



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Division of Air Pollution Control

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Effective Date: 8/25/2009

C. Emissions Unit Terms and Conditions



1. K016, Blanked End Liner 106

Operations, Property and/or Equipment Description:

Blanked End Liner 106

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. g)(1).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)c.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons/year, taking into account the federally enforceable rule limit of 81 percent reduction, by weight, in the overall VOC emissions under OAC rule 3745-21-09(B)(6).
b.	OAC rule 3745-21-09(B)(6) (In lieu of complying with the pounds of VOC per gallon of solids limitation contained in OAC rule 3745-21-09(D)(2)(e))	The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the control efficiency of the regenerative thermal oxidizer (RTO) shall not be less than 90 percent, by weight, for the VOC emissions vented to it.
c.	OAC rule 3745-31-05(D)	See c), d), e), and f) of Section B.1 of the Facility-Wide Terms and Conditions.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Synthetic Minor to Avoid Title V and MACT applicability under 40 CFR Part 63, Subpart KKKK)	

(2) Additional Terms and Conditions

a. All of the VOC emissions from this emissions unit shall be vented to an RTO that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation (whenever solvent-based coatings are being employed).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the air flow in the air duct from this emissions unit at a pressure of not less than 0.100 inches of water, as a 3-hour average as demonstrated in d)(2) below.

(2) The permittee shall install, calibrate, operate and maintain a monitoring device to continuously measure and record the velocity pressure of the air flow within the air duct from this emissions unit at a location downstream of all individual pick-up point connections and upstream of where this duct connects to the main inlet duct to the RTO. The velocity pressure monitoring and recording device shall be installed, calibrated, operated and maintained in accordance with the manufacturer=s recommendations and specifications.

The permittee shall monitor and record the duct velocity pressure for this emissions unit on a once per month basis. The monthly monitoring event shall consist of a continuous 3-hour block of time where instrument readings are taken once every 2 minutes and integrated to create a 3-hour average value. The permittee shall record each monthly 3-hour average duct velocity pressure.

(3) Whenever the monitored 3-hour average duct velocity deviates from the minimum limit of 0.100 inches of water, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.



In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the duct velocity pressure within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the duct velocity pressure immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The duct velocity pressure range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted duct velocity pressure range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the duct velocity pressure range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the RTO shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
- (5) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The acceptable temperature setting shall be based upon the manufacturer's specifications until such



time as any required emission testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit is in operation:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and
- b. a log or record of the operating time for the capture (collection) system, the RTO, the monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (6) Whenever the monitored average combustion temperature within the RTO deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.



Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

- a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
- b. any records of downtime (date and length of time) for the capture (collection) system, the RTO, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
- c. a log of the operating time for the capture system, RTO, monitoring equipment, and the emissions unit(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

(2) The permittee shall identify in the annual permit evaluation report (PER) the following information concerning the operations of the air duct from this emissions unit: All time periods during which the velocity pressure in the air duct from this emissions unit was less than 0.100 inches of water as a 3-hour average as determined in d)(2) above.

(3) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with emission limitation(s) in b)(1) above shall be determined in accordance with the following methods:



a. Emission Limitations:

The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the control efficiency of the RTO shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

Applicable Compliance Method:

Compliance with the emission limitations for VOC above shall be demonstrated based on the results of emissions testing conducted in accordance with f)(2) below.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit, during the first 12 calendar months of operation following the issuance of Permit-to-Install 16-02521 (issued final on 11/6/2008), in accordance with the following requirements:

- a. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency and the control efficiency limitations for VOC.
- b. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).



- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- g) Miscellaneous Requirements
- (1) Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a modification as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.



2. K017, Conversion Press 106

Operations, Property and/or Equipment Description:

Conversion Press 106

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/year.
b.	OAC rule 3745-21-09(U)(2)(e)	See c)(1) below.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Title V and MACT applicability under 40 CFR Part 63 Subpart KKKK)	See c), d), e), and f) of Section B.1 of the Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.



- c) Operational Restrictions
 - (1) The maximum combined daily coatings usage shall not exceed 3.0 gallons.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall record and maintain daily records that include the following information for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the number of gallons of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.
- e) Reporting Requirements
 - (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction. 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 45 days after the exceedance occurs.
 - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
 - (1) Compliance with operational restriction in c)(1) above shall be determined in accordance with the following methods:
 - a. Operational Restriction:

The maximum combined daily coatings usage shall not exceed 3.0 gallons.
 - Applicable Compliance Method:

Compliance with the daily gallon usage restriction above shall be demonstrated based on the record keeping requirements established in d)(1) above.
- g) Miscellaneous Requirements
 - (1) Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary because each emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a modification as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105199

Facility ID: 1677000223

Effective Date: 8/25/2009

increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.