



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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

8/27/2009

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: P0105314
Permit Type: Administrative 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: P0105314
Permit Type: Administrative Modification
Issued: 8/27/2009
Effective: 8/27/2009
Expiration: 11/6/2013



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

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Final Permit-to-Install and Operate
Permit Number: P0105314
Facility ID: 1677000223
Effective Date: 8/27/2009

Authorization

Facility ID: 1677000223
Application Number(s): M0000543
Permit Number: P0105314
Permit Description: Administrative Modification of FEPTIO P0104057 issued final on 11/25/2008 to modify the facility-wide terms and conditions and to correct any mistakes.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 8/27/2009
Effective Date: 8/27/2009
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



Authorization (continued)

Permit Number: P0105314
Permit Description: Administrative Modification of FEPTIO P0104057 issued final on 11/25/2008 to modify the facility-wide terms and conditions and to correct any mistakes.

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

Emissions Unit ID: K010
Company Equipment ID: Blanked End Liner 105
Superseded Permit Number: P0104057
General Permit Category and Type: Not Applicable

Group Name: Group 1

Emissions Unit ID: K005	Company Equipment ID: Conversion Press 102
	Superseded Permit Number: P0104057
	General Permit Category and Type: Not Applicable
Emissions Unit ID: K007	Company Equipment ID: Conversion Press 103
	Superseded Permit Number: P0104057
	General Permit Category and Type: Not Applicable
Emissions Unit ID: K009	Company Equipment ID: Conversion Press 104
	Superseded Permit Number: P0104057
	General Permit Category and Type: Not Applicable
Emissions Unit ID: K011	Company Equipment ID: Conversion Press 105
	Superseded Permit Number: P0104057
	General Permit Category and Type: Not Applicable
Emissions Unit ID: K013	Company Equipment ID: Conversion Press 107
	Superseded Permit Number: P0104057
	General Permit Category and Type: Not Applicable
Emissions Unit ID: K015	Company Equipment ID: Conversion Press 101
	Superseded Permit Number: P0104057
	General Permit Category and Type: Not Applicable
Emissions Unit ID: K019	Company Equipment ID: Conversion Press 108
	Superseded Permit Number: P0104057
	General Permit Category and Type: Not Applicable
Emissions Unit ID: K026	Company Equipment ID: Conversion Press 109
	Superseded Permit Number: P0104057
	General Permit Category and Type: Not Applicable

Group Name: Group 2

Emissions Unit ID: K024	Company Equipment ID: ECoater 104
	Superseded Permit Number: P0104057
	General Permit Category and Type: Not Applicable
Emissions Unit ID: K025	



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Final Permit-to-Install and Operate

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Effective Date: 8/27/2009

Company Equipment ID:	End Liner 109
Superseded Permit Number:	P0104057
General Permit Category and Type:	Not Applicable



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Final Permit-to-Install and Operate

Permit Number: P0105314

Facility ID: 1677000223

Effective Date: 8/27/2009

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: P0105314

Facility ID: 1677000223

Effective Date: 8/27/2009

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: P0105314

Facility ID: 1677000223

Effective Date: 8/27/2009

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.



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Final Permit-to-Install and Operate

Permit Number: P0105314

Facility ID: 1677000223

Effective Date: 8/27/2009

- (2) 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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C. Emissions Unit Terms and Conditions



1. K010, Blanked End Liner 105

Operations, Property and/or Equipment Description:

Blanked End Liner 105

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. None.

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)	See b)(2) below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(D)(2)(e).
b.	OAC rule 3745-21-09(D)(2)(e)	The permittee shall not use coatings that are in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. For emissions unit K010: VOC emissions from this emissions unit shall not exceed 0.31 pound per hour, nor 1.36 tons per year.

[The hourly and annual VOC emission limitations represent the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with these limitations.]



c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific @gallons/year@ and/or @tons/year@ limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings.



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

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

a. Emission Limitations:

VOC emissions from this emissions unit shall not exceed 0.31 pound per hour, nor 1.36 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be demonstrated as follows (for each emissions unit):

- i. multiply the maximum VOC content (lbs/gallon) of the coatings by the maximum hourly number of gallons of coatings;
- ii. multiply the maximum VOC content (lbs/gallon) of the cleanup materials by the maximum hourly number of gallons of cleanup materials; and
- iii. add i + ii.

The annual VOC emission limitations above were established by multiplying the hourly limitations by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitations is maintained, compliance with the annual limitations shall be ensured.

b. Emission Limitations:

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

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be demonstrated based on the record keeping requirements established in d)(1) above.

- (2) 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



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shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary because the 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. Emissions Unit Group - Group 1: K005, K007, K009, K011, K013, K015, K019, K026,

EU ID	Operations, Property and/or Equipment Description
K005	Conversion Press 102
K007	Conversion Press 103
K009	Conversion Press 104
K011	Conversion Press 105
K013	Conversion Press 107
K015	Conversion Press 101
K019	Conversion Press 108
K026	Conversion Press 109

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. None.

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)	See b)(2) below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e).
b.	OAC rule 3745-21-09(U)(2)(e)	See c)(1) below.

(2) Additional Terms and Conditions

a. For emissions unit K005: Volatile organic compound emissions (VOC) shall not exceed 0.89 pound per hour, nor 3.90 tons per year.



- b. For emissions units K007, K009 and K015: VOC emissions from each emissions unit shall not exceed 0.58 pound per hour, nor 2.54 tons per year.
- c. For emissions unit K011: VOC emissions shall not exceed 0.52 pound per hour, nor 2.28 tons per year.
- d. For emissions units K013 and K019: VOC emissions from each emissions unit shall not exceed 0.39 pound per hour, nor 1.71 tons per year.
- e. For emissions unit K026: VOC emissions shall not exceed 1.06 pounds per hour, nor 4.64 tons per year.

[The hourly and annual VOC emission limitations above represent each emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with these emission limitations.]

c) Operational Restrictions

- (1) The maximum combined daily coatings usage, for each emissions unit, shall not exceed 3.0 gallons.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line.
 - a. the name and identification number of each coating employed;
 - b. the volume, in 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 employs more than the applicable maximum daily coating usage limit. 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 the emission limitation(s) in b)(1) above and the operational restriction in c)(1) above shall be determined in accordance with the following methods: shall be determined in accordance with the following methods:



a. Emission Limitations:

For emissions unit K005: VOC emissions shall not exceed 0.89 pound per hour, nor 3.90 tons per year.

For emissions units K007, K009 and K015: VOC emissions from each emissions unit shall not exceed 0.58 pound per hour, nor 2.54 tons per year.

For emissions unit K011: VOC emissions shall not exceed 0.52 pound per hour, nor 2.28 tons per year.

For emissions units K013 and K019: VOC emissions from each emissions unit shall not exceed 0.39 pound per hour, nor 1.71 tons per year.

For emissions unit K026: VOC emissions shall not exceed 1.06 pounds per hour, nor 4.64 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be demonstrated as follows (for each emissions unit):

- i. multiply the maximum VOC content (lbs/gallon) of the coatings by the maximum hourly number of gallons of coatings;
- ii. multiply the maximum VOC content (lbs/gallon) of the cleanup materials by the maximum hourly number of gallons of cleanup materials; and
- iii. add i + ii.

The annual VOC emission limitations above were established by multiplying the hourly limitations by 8760, and then dividing by 2000. Therefore, as long as compliance with the hourly limitations is maintained, compliance with the annual limitations shall be ensured.

b. Operational Restriction:

The maximum combined daily coatings usage, for each emissions unit, 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 the 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



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(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.



3. Emissions Unit Group - Group 2: K024, K025,

EU ID	Operations, Property and/or Equipment Description
K024	ECoater 104
K025	End Liner 109

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. None.

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)	See b)(2)a. below.
b.	OAC rule 3745-21-09(D)(2)(e)	The permittee shall not employ any coating material in this emissions unit that is in excess of 3.7 pounds of VOC per gallon of coating, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than ten tons per year.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific @gallons/year@ and/or @tons/year@ limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

e) Reporting Requirements

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



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

- a. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be demonstrated based on the record keeping requirements established in d)(1) above.

- (2) 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary because the 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.