

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install 01-01302

A. Source Description

Columbus Cello-Poly has submitted a PTI application for the Chapter 31 modification of PTI 01-8034 issued 11/17/99. The existing PTI is for emissions units K007, K008, K009, K010 and P011. The permittee plans to remove EUs K007 and K008 and install K011, a similar color press with two natural gas-fired (indirect) drying ovens, equipped with a permanent total enclosure and controlled with a catalytic incinerator.

B. Facility Emissions and Attainment Status

Columbus Cello-Poly was originally classified as a synthetic minor facility for single and combined HAP in their coatings and solvents. Their synthetic minor restrictions limited their coating and solvent usage giving the permittee facility-wide emissions limitations: a single HAP allowable of 9.9 tpy, a combined HAP allowable of 24.9 tpy and a VOC allowable of 38.0 tpy. The facility no longer employs HAPs in any of their coatings but still wishes to retain the 38.0 tpy VOC limitation.

C. Source Emissions

Annual potential VOC emissions, based on maximum coating and solvent VOC content and maximum coating and solvent usage, is 40.2 tpy. However, they are requesting to retain the same facility-wide allowable that they currently have of 38.0 tpy. Based on their past annual records of coating and solvent usage and future usage assumptions, the facility will be able to keep monthly, rolling records of VOC emissions and stay under their facility-wide allowable of 38.0 tpy VOC.

D. Conclusion

Columbus Cello-Poly will remain a synthetic minor facility since they wish to limit their allowable emissions to a level below their potential to emit. Their annual emissions will be recorded on a rolling, 12-month basis. The operational restrictions, record keeping, reporting and testing requirements will ensure that compliance with this permit is achieved and maintained.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 01-01302

Fac ID: 0125041958

DATE: 9/27/2005

Columbus Cello-Poly Corporation
Jeff Obrecht
4041 Roberts Road
Columbus, OH 432289626

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission

FRANKLIN COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-01302 FOR AN AIR CONTAMINANT SOURCE FOR
Columbus Cello-Poly Corporation**

On 9/27/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Columbus Cello-Poly Corporation**, located at **4041 Roberts Road, Columbus, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-01302:

Modification of current synthetic minor PTI (01-8034 issued 11/17/99) for K009, K010 and P001; adding new unit K011 and withdrawing K007 and K008.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-01302

Application Number: 01-01302
Facility ID: 0125041958
Permit Fee: **To be entered upon final issuance**
Name of Facility: Columbus Cello-Poly Corporation
Person to Contact: Jeff Obrecht
Address: 4041 Roberts Road
Columbus, OH 432289626

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

**4041 Roberts Road
Columbus, Ohio**

Description of proposed emissions unit(s):

Modification of current synthetic minor PTI (01-8034 issued 11/17/99) for K009, K010 and P001; adding new unit K011 and withdrawing K007 and K008.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Columbus Cello-Poly Corporation
PTI Application: 01-01302
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0125041958

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only) TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	38.0
NOx	1.86

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K009 - 8-color amber press with two natural gas-fired (indirect) drying ovens, equipped with a permanent total enclosure and controlled with a catalytic incinerator; terms in this permit supercede those identified in PTI 01-08034 issued 11/17/99.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-10(B)(1)
		OAC rule 3745-35-07(B) (synthetic minor to avoid TV)
	OAC rule 3745-21-09(Y)	
	OAC rule 3745-17-07(A)(1)(a)	

Columbus Cello-Poly Corporation

PTI Application: 01-01202

Issue

Facility ID: 0125041958

Emissions Unit ID: K009

Applicable Emissions
Limitations/Control
Measures

For the coating process:

3.61 lbs volatile organic compounds (VOCs) per hour;

For the oven emissions:

0.16 lb/hr and 0.69 tons per year (TPY) nitrogen oxides (NOx); and

0.003 lb/hr and 0.013 TPY particulate emissions (PE).

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1)(a) and 3745-35-07(B).

The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a

six-minute average, except as provided by rule.

The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

See Sections A.2.a - A.2.c below.

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- 2.a** The emissions of VOCs from K009, K010, K011 and P001 combined shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- 2.b** The overall control efficiency (capture and control) of the catalytic incinerator controlling organic compound emissions from K009, K010, K011 and P001 shall be at least 95% by weight.
- 2.c** The permittee shall install, operate and maintain a permanent total enclosure (PTE) for K009, K010, K011 and P001.
- 2.d** The 3.61 lbs VOC/hr limitation was established to reflect the potential to emit for K009. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

The emission limitations for each oven established in Section A.1 above for NOx and PE reflect the potential to emit of this emission unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

- 2.e** The PTE associated with these emissions units (K009, K010, K011 and P001) shall demonstrate that it meets the criteria established for a PTE in USEPA Method 204. The permittee shall perform an additional demonstration to show that the PTE could not be compromised under normal plant conditions, when any of the emissions units are in operation (i.e., the air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points, or non-natural draft openings, which could effect the PTE, are opened.) Once the PTE is demonstrated per Method 204, the permittee will not be required to perform any additional monitoring, record keeping and reporting to ensure the ongoing integrity of the PTE.

B. Operational Restrictions

- 1. The catalytic incinerator associated with emissions units K009, K010, K011 and P001 shall be operating while any of the listed emissions units are operating.
- 2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when K009, K010, K011 and/or P001 are in operation, shall

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not be less than 600°F or more than 50°F below the average temperature during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance.

3. If the results of the additional testing required in Section A.2.e are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emissions test that demonstrated the emissions unit was in compliance.
4. The permittee shall burn only natural gas in this emissions unit.
5. The maximum VOC content of the coatings used in this emissions unit shall not exceed 5.75 lbs/gal, by weight, and the maximum VOC content of the solvents used in this emissions unit shall not exceed 6.58 lbs/gal, by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units (K009, K010, K011 and P001);
- b. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature of the exhaust gases immediately before the catalyst bed is less than 600°F or more that 50°F below

Emissions Unit ID: **K009**

the average temperature of the exhaust gases during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance; and

- c. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference during their most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance.
2. The permittee shall collect and record the following information each month from emissions units K009, K010, K011 and P001:
- a. the name and identification number of each coating and solvent, as applied;
 - b. the VOC content of each coating and solvent in percent weight, as applied;
 - c. the number of pounds of each coating and solvent employed;
 - d. the name and identification of each cleanup material, as applied;
 - e. the VOC content of each cleanup material in percent weight, as applied;
 - f. the number of pounds of each cleanup material employed;
 - g. the total uncontrolled VOC emissions from emissions units K009, K010 and K011 from all coatings, solvents and cleanup materials employed in pounds per month;
 - h. the total uncontrolled VOC emissions from emissions unit P001 from all coatings, solvents and cleanup materials employed, in pounds per month. Multiply the maximum amount of coating and cleanup material used in a month, in pounds, with the AP-42 emission factor (30 lbs VOC/ton) and divide by 2,000 lbs/ton to obtain the uncontrolled organic compound emissions in pounds per month; and
 - i. the calculated, controlled VOC emissions rate for all coatings, solvents and cleanup materials, in tons per calendar month. The controlled VOC emissions rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrates that emissions units K009, K010, K011 and P001 are in

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compliance.

3. If the results of the additional testing required in Section A.2.e are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permittee shall install, maintain and operate monitoring and recording devices which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area; and
 - b. a log or record of downtime for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.
4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from K009, K010, K011 and P001 for the previous calendar year and shall be submitted by January 31 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emission unit in the annual Fee Emission Report.
2. If the results of the additional testing required in Section A.2.e are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the PTE was not maintained at the required differential pressure specified above.

The permittee shall submit quarterly summaries of the following records:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units (K009, K010, K011 and P001);

- b. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 600°F or more than 50°F below the average temperature of the exhaust gases during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance; and
- c. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance.

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

- 3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the catalytic incinerator was not operated while any of the emissions units--K009, K010, K011 and P001--were in operation. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, Central District Office (CDO) within 30 days of the deviation.

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4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.
5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the annual VOC limitation based upon a rolling, 12-month summation of the monthly emissions. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.
6. The permittee shall submit deviation (excursion) reports that identify all exceedances of the coating and solvent VOC content limitations. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
3.61 lbs VOC/hr from coating operations

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$[(5.75 \text{ lbs VOC/gal}) \cdot (2.7 \text{ gals/hr}) + (6.58 \text{ lbs VOC/gal}) \cdot (8.6 \text{ gals/hr})] \cdot (1 - 0.95)$$

where:

5.75 lbs VOC/gal is coating with the maximum VOC content;
 2.7 gals/hr is the maximum coating usage rate;
 6.58 lbs VOC/gal is the VOC content of the solvent (IPA) used;
 8.6 gals/hr is the maximum solvent usage rate; and
 95% is the rated control efficiency of the catalytic incinerator

- b. Emission Limitation
Combined VOC emissions from K009, K010, K011 and P001 shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Columbus Cello-Poly Corporation
PTI Application: 01-01202
Issue

Facility ID: 0125041958

Emissions Unit ID: K009

Applicable Compliance Method

Compliance may be determined based upon the recordkeeping requirements specified above in Section C.2.

Issued: To be entered upon final issuancec. Emission Limitation

0.16 lb/hr NOx from natural gas combustion in the ovens

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$(100 \text{ lb NOx/mmcf}) * (1,569 \text{ cf/hr})$$

where:

100 lb NOx/mmcf is the AP-42 NOx emissions factor for natural gas combustion;
and

1,569 cf/hr is the maximum fuel input of the ovens

d. Emission Limitation

0.003 lb/hr particulate emissions (PE) from natural gas combustion in the ovens

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$(1.9 \text{ lb PE/mmcf}) * (1,569 \text{ cf/hr})$$

where:

1.9 lb PE/mmcf is the AP-42 particulate emissions factor for natural gas
combustion

e. Emission Limitation

0.69 TPY NOx and 0.013 TPY PE from natural gas combustion in the ovens

Applicable Compliance Method

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained. The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year and dividing by 2000 lbs/ton.

f. Emission Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance shall be determined through visible emission

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observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. The permittee shall conduct, or have conducted, emission testing for K009, K010, K011 and P001 in accordance with the following requirements:
 - a. the emission testing shall be conducted within 90 days of completion of installation of K011;
 - b. the emission testing shall be conducted to demonstrate compliance with the 95%, but weight, overall control efficiency (capture and control) and the 95%, by weight, catalytic incinerator control efficiency requirements specified in Section A.2; and,
 - c. the following test methods shall be employed to determine the overall control efficiency of the control equipment serving K009, K010, K011 and P001: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

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. 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 OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration of the potential presence of interfering gases.

- d. The tests shall be conducted while K009, K010, K011 and P001 are venting emissions to the catalytic incinerator. K009, K010, K011 and P001 shall be operated at or near their maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office (CDO).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, CDO. The "Intent to Test" notification shall describe in detail the proposed test methods and

**Column
PTI A**

Emissions Unit ID: **K009**

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procedures, the emissions unit operating parameters, the time and date of the test, and the person who will conduct the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, CDO's refusal to accept the results of the emission test.

Personnel from the Ohio EPA, CDO, 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.

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 Ohio EPA, CDO 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 Ohio EPA, CDO.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K010 - 8-color emerald press with two natural gas-fired (indirect) drying ovens, equipped with a permanent total enclosure and controlled with a catalytic incinerator; terms in this permit supercede those identified in PTI 01-08034 issued 11/17/99.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-35-07(B) (synthetic minor to avoid TV)
	OAC rule 3745-21-09(Y)	
	OAC rule 3745-17-07(A)(1)(a)	
	OAC rule 3745-17-10(B)(1)	

Column**PTI A**Emissions Unit ID: **K010****Issued: To be entered upon final issuance**

<u>Applicable Emissions Limitations/Control Measures</u>	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
For the coating process:	
1.82 lbs VOC/hour;	See Sections A.2.a - A.2.c below.
For the oven emissions:	
0.11 lb/hr and 0.48 TPY NOx; and	
0.002 lb/hr and 0.009 TPY PE	
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1)(a) and 3745-35-07(B).	
The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).	
Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The emissions of VOCs from K009, K010, K011 and P001 combined shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- 2.b** The overall control efficiency (capture and control) of the catalytic incinerator controlling organic compound emissions from K009, K010, K011 and P001 shall be at least 95% by weight.
- 2.c** The permittee shall install, operate and maintain a permanent total enclosure (PTE) for K009, K010, K011 and P001.
- 2.d** The 1.82 lbs VOC/hr limitation was established to reflect the potential to emit for K010. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

The emission limitations for each oven established in Section A.1 above for NOx and PE reflect the potential to emit of this emission unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

- 2.e** The PTE associated with these emissions units (K009, K010, K011 and P001) shall demonstrate that it meets the criteria established for a PTE in USEPA Method 204. The permittee shall perform an additional demonstration to show that the PTE could not be compromised under normal plant conditions, when any of the emissions units are in operation (i.e., the air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points, or non-natural draft openings, which could effect the PTE, are opened.) Once the PTE is demonstrated per Method 204, the permittee will not be required to perform any additional monitoring, record keeping and reporting to ensure the ongoing integrity of the PTE.

B. Operational Restrictions

- 1. The catalytic incinerator associated with emissions units K009, K010, K011 and P001 shall be operating while any of the listed emissions units are operating.
- 2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when K009, K010, K011 and/or P001 are in operation, shall

Emissions Unit ID: **K010**

not be less than 600°F or more than 50°F below the average temperature during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance.

3. If the results of the additional testing required in Section A.2.e are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emissions test that demonstrated the emissions unit was in compliance.
4. The permittee shall burn only natural gas in this emissions unit.
5. The maximum VOC content of the coatings used in this emissions unit shall not exceed 5.75 lbs/gal, by weight, and the maximum VOC content of the solvents used in this emissions unit shall not exceed 6.58 lbs/gal, by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units (K009, K010, K011 and P001);
- b. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature of the exhaust gases immediately before the catalyst bed is less than 600°F or more that 50°F below

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- the average temperature of the exhaust gases during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance; and
- c. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference during their most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance.
2. The permittee shall collect and record the following information each month from emissions units K009, K010, K011 and P001:
 - a. the name and identification number of each coating and solvent, as applied;
 - b. the VOC content of each coating and solvent in percent weight, as applied;
 - c. the number of pounds of each coating and solvent employed;
 - d. the name and identification of each cleanup material, as applied;
 - e. the VOC content of each cleanup material in percent weight, as applied;
 - f. the number of pounds of each cleanup material employed;
 - g. the total uncontrolled VOC emissions from emissions units K009, K010 and K011 from all coatings, solvents and cleanup materials employed in pounds per month;
 - h. the total uncontrolled VOC emissions from emissions unit P001 from all coatings, solvents and cleanup materials employed, in pounds per month. Multiply the maximum amount of coating and cleanup material used in a month, in pounds, with the AP-42 emission factor (30 lbs VOC/ton) and divide by 2,000 lbs/ton to obtain the uncontrolled organic compound emissions in pounds per month; and
 - i. the calculated, controlled VOC emissions rate for all coatings, solvents and cleanup materials, in tons per calendar month. The controlled VOC emissions rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance.

3. If the results of the additional testing required in Section A.2.e are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permittee shall install, maintain and operate monitoring and recording devices which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area; and
 - b. a log or record of downtime for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.
4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Column

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Emissions Unit ID: **K010****D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total VOC emissions from K009, K010, K011 and P001 for the previous calendar year and shall be submitted by January 31 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emission unit in the annual Fee Emission Report.
2. If the results of the additional testing required in Section A.2.e are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the PTE was not maintained at the required differential pressure specified above.

The permittee shall submit quarterly summaries of the following records:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units (K009, K010, K011 and P001);
- b. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 600°F or more than 50°F below the average temperature of the exhaust gases during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance; and
- c. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance.

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

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the catalytic incinerator was not operated while any of the emissions units--K009, K010, K011 and P001--were in operation. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, Central District Office

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(CDO) within 30 days of the deviation.

4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.
5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the annual VOC limitation based upon a rolling, 12-month summation of the monthly emissions. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.
6. The permittee shall submit deviation (excursion) reports that identify all exceedances of the coating and solvent VOC content limitations. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
1.82 lbs VOC/hr from coating operations

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$[(5.75 \text{ lbs VOC/gal}) * (1.4 \text{ gals/hr}) + (6.58 \text{ lbs VOC/gal}) * (4.3 \text{ gals/hr})] * (1 - 0.95)$$

where:

5.75 lbs VOC/gal is coating with the maximum VOC content;
1.4 gals/hr is the maximum coating usage rate;
6.58 lbs VOC/gal is the VOC content of the solvent (IPA) used;
4.3 gals/hr is the maximum solvent usage rate; and
95% is the rated control efficiency of the catalytic incinerator

- b. Emission Limitation
Combined VOC emissions from K009, K010, K011 and P001 shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly

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emissions.

Applicable Compliance Method

Compliance may be determined based upon the recordkeeping requirements specified above in Section C.2.

c. Emission Limitation

0.11 lb/hr NO_x from natural gas combustion in the ovens

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

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$$(100 \text{ lb NOx/mmcf}) * (1,098 \text{ cf/hr})$$

where:

100 lb NOx/mmcf is the AP-42 NOx emissions factor for natural gas combustion;
and

1,098 cf/hr is the maximum fuel input of the ovens

- d. Emission Limitation
0.002 lb/hr particulate emissions (PE) from natural gas combustion in the ovens

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$(1.9 \text{ lb PE/mmcf}) * (1,098 \text{ cf/hr})$$

where:

1.9 lb PE/mmcf is the AP-42 particulate emissions factor for natural gas combustion

- e. Emission Limitation
0.48 TPY NOx and 0.009 TPY PE from natural gas combustion in the ovens

Applicable Compliance Method

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained. The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year and dividing by 2000 lbs/ton.

- f. Emission Limitation
Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. The permittee shall conduct, or have conducted, emission testing for K009, K010, K011 and P001 in accordance with the following requirements:

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- a. the emission testing shall be conducted within 90 days of completion of installation of K011;
- b. the emission testing shall be conducted to demonstrate compliance with the 95%, by weight, overall control efficiency (capture and control) and the 95%, by weight, catalytic incinerator control efficiency requirements specified in Section A.2; and,
- c. the following test methods shall be employed to determine the overall control efficiency of the control equipment serving K009, K010, K011 and P001: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

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. 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 OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration of the potential presence of interfering gases.

- d. The tests shall be conducted while K009, K010, K011 and P001 are venting emissions to the catalytic incinerator. K009, K010, K011 and P001 shall be operated at or near their maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office (CDO).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, CDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will conduct the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, CDO's refusal to accept the results of the emission test.

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Personnel from the Ohio EPA, CDO, 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.

Column**PTI A**Emissions Unit ID: **K010****Issued: To be entered upon final issuance**

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 Ohio EPA, CDO 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 Ohio EPA, CDO.

F. Miscellaneous Requirements

None

Column
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Emissions Unit ID: **K011**

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K011 - emerald 130-10 color press with two natural gas-fired (indirect) drying ovens, equipped with a permanent total enclosure and controlled with a catalytic incinerator; terms in this permit supercede those identified in PTI 01-08034 issued 11/17/99.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-35-07(B) (synthetic minor to avoid TV)
	OAC rule 3745-21-09(Y)	
	OAC rule 3745-17-07(A)(1)(a)	
	OAC rule 3745-17-10(B)(1)	

Column**PTI A**Emissions Unit ID: **K011****Issued: To be entered upon final issuance**Applicable Emissions
Limitations/Control
Measures

The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

For the coating process:

3.61 lbs VOCs/hour;

See Sections A.2.a - A.2.c below.

For the oven emissions:

0.16 lb/hr and 0.69 TPY NO_x; and

0.003 lb/hr and 0.013 TPY PE

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1)(a) and 3745-35-07(B).

The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The emissions of VOCs from K009, K010, K011 and P001 combined shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- 2.b** The overall control efficiency (capture and control) of the catalytic incinerator controlling organic compound emissions from K009, K010, K011 and P001 shall be at least 95% by weight.
- 2.c** The permittee shall install, operate and maintain a permanent total enclosure (PTE) for K009, K010, K011 and P001.
- 2.d** The 3.61 lbs VOC/hr limitation was established to reflect the potential to emit for K011. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

The emission limitations for each oven established in Section A.1 above for NOx and PE reflect the potential to emit of this emission unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

- 2.e** The PTE associated with these emissions units (K009, K010, K011 and P001) shall demonstrate that it meets the criteria established for a PTE in USEPA Method 204. The permittee shall perform an additional demonstration to show that the PTE could not be compromised under normal plant conditions, when any of the emissions units are in operation (i.e., the air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points, or non-natural draft openings, which could effect the PTE, are opened.) Once the PTE is demonstrated per Method 204, the permittee will not be required to perform any additional monitoring, recordkeeping and reporting to ensure the ongoing integrity of the PTE.

B. Operational Restrictions

- 1. The catalytic incinerator associated with emissions units K009, K010, K011 and P001 shall be operating while any of the listed emissions units are operating.
- 2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when K009, K010, K011 and/or P001 are in operation, shall

Emissions Unit ID: **K011**

not be less than 600°F or more than 50°F below the average temperature during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance.

3. If the results of the additional testing required in Section A.2.e are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emissions test that demonstrated the emissions unit was in compliance.
4. The permittee shall burn only natural gas in this emissions unit.
5. The maximum VOC content of the coatings used in this emissions unit shall not exceed 5.75 lbs/gal, by weight, and the maximum VOC content of the solvents used in this emissions unit shall not exceed 6.58 lbs/gal, by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units (K009, K010, K011 and P001);
- b. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature of the exhaust gases immediately before the catalyst bed is less than 600°F or more that 50°F below the average temperature of the exhaust gases during the most recent

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- performance test that demonstrates that K009, K010, K011 and P001 are in compliance; and
- c. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference during their most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance.
2. The permittee shall collect and record the following information each month from emissions units K009, K010, K011 and P001:
 - a. the name and identification number of each coating and solvent, as applied;
 - b. the VOC content of each coating and solvent in percent weight, as applied;
 - c. the number of pounds of each coating and solvent employed;
 - d. the name and identification of each cleanup material, as applied;
 - e. the VOC content of each cleanup material in percent weight, as applied;
 - f. the number of pounds of each cleanup material employed;
 - g. the total uncontrolled VOC emissions from emissions units K009, K010 and K011 from all coatings, solvents and cleanup materials employed in pounds per month;
 - h. the total uncontrolled VOC emissions from emissions unit P001 from all coatings, solvents and cleanup materials employed, in pounds per month. Multiply the maximum amount of coating and cleanup material used in a month, in pounds, with the AP-42 emission factor (30 lbs VOC/ton) and divide by 2,000 lbs/ton to obtain the uncontrolled organic compound emissions in pounds per month; and
 - i. the calculated, controlled VOC emissions rate for all coatings, solvents and cleanup materials, in tons per calendar month. The controlled VOC emissions rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance.

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3. If the results of the additional testing required in Section A.2.e are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permittee shall install, maintain and operate monitoring and recording devices which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area; and
 - b. a log or record of downtime for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.
4. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Column**PTI A**Emissions Unit ID: **K011****Issued: To be entered upon final issuance****D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total VOC emissions from K009, K010, K011 and P001 for the previous calendar year and shall be submitted by January 31 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emission unit in the annual Fee Emission Report.
2. If the results of the additional testing required in Section A.2.e are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the PTE was not maintained at the required differential pressure specified above.

The permittee shall submit quarterly summaries of the following records:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units (K009, K010, K011 and P001);
- b. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 600°F or more than 50°F below the average temperature of the exhaust gases during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance; and
- c. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance.

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

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the catalytic incinerator was not operated while any of the emissions units--K009, K010, K011 and P001--were in operation. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, Central District Office

(CDO) within 30 days of the deviation.

4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.
5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the annual VOC limitation based upon a rolling, 12-month summation of the monthly emissions. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.
6. The permittee shall submit deviation (excursion) reports that identify all exceedances of the coating and solvent VOC content limitations. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
3.61 lbs VOC/hr from coating operations

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$[(5.75 \text{ lbs VOC/gal}) \cdot (2.7 \text{ gals/hr}) + (6.58 \text{ lbs VOC/gal}) \cdot (8.6 \text{ gals/hr})] \cdot (1 - 0.95)$$

where:

5.75 lbs VOC/gal is coating with the maximum VOC content;
 2.7 gals/hr is the maximum coating usage rate;
 6.58 lbs VOC/gal is the VOC content of the solvent (IPA) used;
 8.6 gals/hr is the maximum solvent usage rate; and
 95% is the rated control efficiency of the catalytic incinerator

- b. Emission Limitation
Combined VOC emissions from K009, K010, K011 and P001 shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

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Applicable Compliance Method

Compliance may be determined based upon the recordkeeping requirements specified above in Section C.2.

c. Emission Limitation

0.16 lb/hr NOx from natural gas combustion in the ovens

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$(100 \text{ lb NOx/mmcf}) * (1,569 \text{ cf/hr})$$

where:

100 lb NOx/mmcf is the AP-42 NOx emissions factor for natural gas combustion;
and

1,569 cf/hr is the maximum fuel input of the ovens

d. Emission Limitation

0.003 lb/hr particulate emissions (PE) from natural gas combustion in the ovens

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$(1.9 \text{ lb PE/mmcf}) * (1,569 \text{ cf/hr})$$

where:

1.9 lb PE/mmcf is the AP-42 particulate emissions factor for natural gas combustion

e. Emission Limitation

0.69 TPY NOx and 0.013 TPY PE from natural gas combustion in the ovens

Applicable Compliance Method

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained. The annual limitation was calculated by multiplying the hourly limitation by 8760 hours/year and dividing by 2000 lbs/ton.

f. Emission Limitation

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Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

2. The permittee shall conduct, or have conducted, emission testing for K009, K010, K011 and P001 in accordance with the following requirements:
 - a. the emission testing shall be conducted within 90 days of completion of installation of K011;
 - b. the emission testing shall be conducted to demonstrate compliance with the 95%, but weight, overall control efficiency (capture and control) and the 95%, by weight, catalytic incinerator control efficiency requirements specified in Section A.2; and,
 - c. the following test methods shall be employed to determine the overall control efficiency of the control equipment serving K009, K010, K011 and P001: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

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. 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 OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration of the potential presence of interfering gases.

- d. The tests shall be conducted while K009, K010, K011 and P001 are venting emissions to the catalytic incinerator. K009, K010, K011 and P001 shall be operated at or near their maximum capacity, unless otherwise specified or

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approved by the Ohio EPA, Central District Office (CDO).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, CDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will conduct the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, CDO's refusal to accept the results of the emission test.

Personnel from the Ohio EPA, CDO, 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.

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 Ohio EPA, CDO 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 Ohio EPA, CDO.

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F. Miscellaneous Requirements

None

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Emissions Unit ID: P001

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - ink and solvent mixing room, equipped with a permanent total enclosure and controlled with a catalytic incinerator; terms in this permit supercede those identified in PTI 01-08034 issued 11/17/99.	OAC rule 3745-31-05(A)(3)	0.14 lb VOC/hr
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
	OAC rule 3745-35-07(B) (synthetic minor to avoid TV)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
		See Section A.2.a - A.2.c below.

2. Additional Terms and Conditions

- 2.a The emissions of VOCs from K009, K010, K011 and P001 combined shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- 2.b The overall control efficiency (capture and control) of the catalytic incinerator controlling organic compound emissions from K009, K010, K011 and P001 shall be at least 95% by weight.
- 2.c The permittee shall install, operate and maintain a permanent total enclosure (PTE) for K009, K010, K011 and P001.
- 2.d The PTE associated with these emissions units (K009, K010, K011 and P001)

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shall demonstrate that it meets the criteria established for a PTE in USEPA Method 204. The permittee shall perform an additional demonstration to show that the PTE could not be compromised under normal plant conditions, when any of the emissions units are in operation (i.e., the air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points, or non-natural draft openings, which could effect the PTE, are opened.) Once the PTE is demonstrated per Method 204, the permittee will not be required to perform any additional monitoring, recordkeeping and reporting to ensure the ongoing integrity of the PTE.

- 2.e** The 0.14 lbs VOC/hr limitation was established to reflect the potential to emit for P001. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limitation.

B. Operational Restrictions

1. The catalytic incinerator associated with emissions units K009, K010, K011 and P001 shall be operating while any of the listed emissions units are operating.
2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when K009, K010, K011 and/or P001 are in operation, shall not be less than 600°F or more than 50°F below the average temperature during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance.
3. If the results of the additional testing required in Section A.2.d are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emissions test that demonstrated the emissions unit was in compliance.
4. The maximum VOC content of the coatings used in this emissions unit shall not exceed 5.75 lbs/gal, by weight, and the maximum VOC content of the solvents used in this emissions unit shall not exceed 6.58 lbs/gal, by weight.

C. Monitoring and/or Recordkeeping Requirements

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1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units (K009, K010, K011 and P001);
 - b. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature of the exhaust gases immediately before the catalyst bed is less than 600°F or more that 50°F below the average temperature of the exhaust gases during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance; and
 - c. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference during them most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance.
2. The permittee shall collect and record the following information each month from emissions units K009, K010, K011 and P001:
 - a. the name and identification number of each coating and solvent, as applied;
 - b. the VOC content of each coating and solvent in percent weight, as applied;
 - c. the number of pounds of each coating and solvent employed;
 - d. the name and identification of each cleanup material, as applied;
 - e. the VOC content of each cleanup material in percent weight, as applied;

- f. the number of pounds of each cleanup material employed;
 - g. the total uncontrolled VOC emissions from emissions units K009, K010 and K011 from all coatings, solvents and cleanup materials employed in pounds per month;
 - h. the total uncontrolled VOC emissions from emissions unit P001 from all coatings, solvents and cleanup materials employed, in pounds per month. Multiply the maximum amount of coating and cleanup material used in a month, in pounds, with the AP-42 emission factor (30 lbs VOC/ton) and divide by 2,000 lbs/ton to obtain the uncontrolled organic compound emissions in pounds per month; and
 - i. the calculated, controlled VOC emissions rate for all coatings, solvents and cleanup materials, in tons per calendar month. The controlled VOC emissions rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrates that K009, K010, K011 and P001 are in compliance.
3. If the results of the additional testing required in Section A.2.d are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permittee shall install, maintain and operate monitoring and recording devices which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area; and
- b. a log or record of downtime for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from K009, K010, K011 and P001 for the previous calendar year and shall be submitted by January 31 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emission unit in the annual Fee

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Emission Report.

2. If the results of the additional testing required in Section A.2.d are unsuccessful in demonstrating that the PTE could not be compromised under normal plant conditions, the permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the PTE was not maintained at the required differential pressure specified above.

The permittee shall submit quarterly summaries of the following records:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions units (K009, K010, K011 and P001);
- b. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature of the exhaust gases immediately before the catalyst bed was less than 600°F or more than 50°F below the average temperature of the exhaust gases during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance; and
- c. all 3-hour blocks of time--when K009, K010, K011 and/or P001 are in operation--during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrates that K009, K010, K011 and P001 are in compliance.

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

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the catalytic incinerator was not operated while any of the emissions units--K009, K010, K011 and P001--were in operation. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, Central District Office (CDO) within 30 days of the deviation.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the annual VOC limitation based upon a rolling, 12-month summation of the monthly emissions. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

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5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the coating and solvent VOC content limitations. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.14 lbs VOC/hr from coating operations

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$(187 \text{ lbs/hr}) * (1 \text{ ton}/2000 \text{ lbs}) * (30 \text{ lbs VOC/ton})$$

where:

187 lbs/hr is maximum production mixing rate; and
 30 lbs VOC/ton is the AP-42 emissions factor for paint and varnish manufacturing, per Table 6.4

- b. Emission Limitation
Combined VOC emissions from K009, K010, K011 and P001 shall not exceed 38.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance may be determined based upon the recordkeeping requirements specified above in Section C.2.

2. The permittee shall conduct, or have conducted, emission testing for K009, K010, K011 and P001 in accordance with the following requirements:
 - a. the emission testing shall be conducted within 90 days of completion of installation of K011;
 - b. the emission testing shall be conducted to demonstrate compliance with the 95%, by weight, overall control efficiency (capture and control) and the 95%, by weight, catalytic incinerator control efficiency requirements specified in Section

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A.2; and,

- c. the following test methods shall be employed to determine the overall control efficiency of the control equipment serving K009, K010, K011 and P001: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

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. 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 OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration of the potential presence of interfering gases.

- d. The tests shall be conducted while K009, K010, K011 and P001 are venting emissions to the catalytic incinerator. K009, K010, K011 and P001 shall be operated at or near their maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office (CDO).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, CDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person who will conduct the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA, CDO's refusal to accept the results of the emission test.

Personnel from the Ohio EPA, CDO, 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.

A comprehensive written report on the results of the emissions test(s) shall be

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signed by the person or persons responsible for the tests and submitted to the Ohio EPA, CDO 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 Ohio EPA, CDO.

F. Miscellaneous Requirements

None