



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-01302

Fac ID: 0125041958

DATE: 2/14/2006

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

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Sincerely,

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

CC: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 2/14/2006
Effective Date: 2/14/2006**

FINAL PERMIT TO INSTALL 01-01302

Application Number: 01-01302
Facility ID: 0125041958
Permit Fee: **\$800**
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

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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

Columbus Cello-Poly Corporation
PTI Application: 01-01302
Issued: 2/14/2006

Facility ID: 0125041958

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

Columbus Cello-Poly Corporation
PTI Application: 01-01302
Issued: 2/14/2006

Facility ID: 0125041958

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

Columbus Cello-Poly Corporation
 PTI Application: 01-01302
 Issued: 2/14/2006

Facility ID: 0125041958

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
HAP (single)	9.9
HAP (combined)	24.9

7

Columbus Cello-Poly Corporation
PTI Application: 01-01302
Issued: 2/14/2006

Facility ID: 0125041958

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	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-10(B)(1)
(Terms in this permit supercede those identified in PTI 01-08034 issued 11/17/99.)	OAC rule 3745-21-09(Y)	OAC rule 3745-35-07(B) (synthetic minor to avoid TV)
	OAC rule 3745-17-07(A)(1)(a)	

Column**PTI A****Issued: 2/14/2006**Emissions Unit ID: **K009**

Applicable Emissions
Limitations/Control
Measures

20% opacity as a six-minute average, except as provided by rule.

For the coating process:

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

3.67 lbs volatile organic compounds (VOCs) per hour;

For the oven emissions:

See Sections A.2.a - A.2.c, A.2.f, B.1, B.2 and B.3 below.

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

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 and HAP 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 NO_x 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.
- 2.f** The maximum annual HAP emissions for emissions units K009, K010, K011 and P001 shall not exceed 9.9 tons for individual HAPs and 24.9 tons for combined HAPs, based upon a rolling, 12-month summation of the HAP emissions.

B. Operational Restrictions

- 1.** The catalytic incinerator associated with emissions units K009, K010, K011 and P001

Emissions Unit ID: **K009**

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.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.

C. Monitoring and/or Record keeping 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 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 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.
 5. The permittee shall collect and record the following information each month for emissions units K009, K010, K011 and P001:
 - a. The name and identification number of each coating, as applied;
 - b. The individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. The number of gallons of each coating employed;
 - e. The name and identification of each cleanup material employed;

- f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
- g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
- h. The number of gallons of each cleanup material employed;
- i. The total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material) multiplied by the control efficiency of the catalytic incinerator (1-0.95); and
- j. The total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material) multiplied by the control efficiency of the catalytic incinerator (1-0.95).

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 field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. Changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and

Emissions Unit ID: **K009**

BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.
8. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall 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 quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The rolling, 12-month total individual HAP emission limitation; and
 - b. The rolling, 12-month total combined HAP emissions limitation.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

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
3.67 lbs VOC/hr from coating operations

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$E = [(23.4) \times (0.7176) + (56.7) \times (1)] \times (1 - 0.95)$$

where:

23.4 lbs. is the maximum quantity of ink used in one hour
 71.76% is the volatile organic content of the ink in weight percent
 56.7 lbs. is the maximum quantity of solvent used in one hour
 100% is the volatile organic content of the solvent in weight percent
 95% is the 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.

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 NO_x from natural gas combustion in the ovens

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$(100 \text{ lb NO}_x/\text{mmcf}) \times (1,569 \text{ cf/hr})$$

where:

100 lb NO_x/mmcf is the AP-42 NO_x 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:

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

where:

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

- e. Emission Limitation
0.69 TPY NO_x 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 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).

- g. Emission Limitation
The annual, individual and total hazardous air pollutant (HAP) emissions from emissions units K009, K010, K011 and P001 shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable Compliance Method

Compliance with these emission limitations shall be demonstrated through the records required pursuant to Section C.5 above.

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 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 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

Columbus Cello-Poly Corporation

PTI Application: 01-01202

Issue

Facility ID: 0125041958

Emissions Unit ID: K010

Applicable Emissions
Limitations/Control
Measures

For the coating process:

1.83 lbs VOC/hour;

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.

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, A.2.f, B.1, B.2 and B.3 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 and HAP 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 NO_x 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.
- 2.f** The maximum annual HAP emissions for emissions units K009, K010, K011 and P001 shall not exceed 9.9 tons for individual HAPs and 24.9 tons for combined HAPs, based upon a rolling, 12-month summation of the HAP emissions.

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.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.

C. Monitoring and/or Record keeping 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

Emissions Unit ID: **K010**

immediately before the catalyst bed is 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 is less than 80 percent of the average temperature difference during the 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 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.
 5. The permittee shall collect and record the following information each month for emissions units K009, K010, K011 and P001:
 - a. The name and identification number of each coating, as applied;
 - b. The individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. The number of gallons of each coating employed;
 - e. The name and identification of each cleanup material employed;

Emissions Unit ID: **K010**

- f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
- g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
- h. The number of gallons of each cleanup material employed;
- i. The total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material) multiplied by the control efficiency of the catalytic incinerator (1-0.95); and
- j. The total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material) multiplied by the control efficiency of the catalytic incinerator (1-0.95).

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 field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. Changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents,

Biological Exposure Indices");

- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.
8. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall 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 quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The rolling, 12-month total individual HAP emission limitation; and
 - b. The rolling, 12-month total combined HAP emissions limitation.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

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
1.83 lbs VOC/hr from coating operations

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$E = [(11.7) \times (0.7176) + (28.3) \times (1)] \times (1 - 0.95)$$

where:

- 11.7 lbs. is the maximum quantity of ink used in one hour
- 71.76% is the volatile organic content of the ink in weight percent
- 28.3 lbs. is the maximum quantity of solvent used in one hour
- 100% is the volatile organic content of the solvent in weight percent
- 95% is the 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.
- 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 NOx from natural gas combustion in the ovens
- Applicable Compliance Method
Compliance may be determined based upon the following calculation:
- $$(100 \text{ lb NOx/mmcf}) * (1,098 \text{ cf/hr})$$
- 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).
- g. Emission Limitation
The annual, individual and total hazardous air pollutant (HAP) emissions from all emissions units at this facility shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.
- Applicable Compliance Method
Compliance with these emission limitations shall be demonstrated through the records required pursuant to Section C.5 above.
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 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 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

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

Facility ID: 0125041958

Emissions Unit ID: K010

None

Column**PTI A****Issued: 2/14/2006**Emissions Unit ID: **K011**

Applicable Emissions
Limitations/Control
Measures

For the coating process:

3.67 lbs VOCs/hour;

For the oven emissions:

0.16 lb/hr and 0.69 TPY
 NOx; 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.

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, A.2.f, B.1, B.2 and B.3 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 and HAP 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 NO_x 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.
- 2.f** The maximum annual HAP emissions for emissions units K009, K010, K011 and P001 shall not exceed 9.9 tons for individual HAPs and 24.9 tons for combined HAPs, based upon a rolling, 12-month summation of the HAP emissions.

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.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.

C. Monitoring and/or Record keeping 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

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

Emissions Unit ID: **K011**

equipment as determined during the most recent emission test that demonstrates that emissions units 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.
 5. The permittee shall collect and record the following information each month for emissions units K009, K010, K011 and P001:
 - a. The name and identification number of each coating, as applied;
 - b. The individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. The number of gallons of each coating employed;
 - e. The name and identification of each cleanup material employed;
 - f. The individual HAP content for each HAP of each cleanup material in pounds of

- individual HAP per gallon cleanup material, as applied;
- g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. The number of gallons of each cleanup material employed;
 - i. The total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material) multiplied by the control efficiency of the catalytic incinerator (1-0.95); and
 - j. The total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material) multiplied by the control efficiency of the catalytic incinerator (1-0.95).

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 field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. Changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents,

Biological Exposure Indices");

- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
7. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.
8. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall 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

Emissions Unit ID: **K011**

the annual VOC limitation based upon a rolling, 12-month summation of the monthly emissions. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The rolling, 12-month total individual HAP emission limitation; and
 - b. The rolling, 12-month total combined HAP emissions limitation.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

7. The permittee shall submit annual reports which specify the individual and combined HAP emissions from emissions units K009, K010, K011 and P001 for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

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
3.67 lbs VOC/hr from coating operations

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$E = [(23.4) \times (0.7176) + (56.7) \times (1)] \times (1 - 0.95)$$

where:

23.4 lbs. is the maximum quantity of ink used in one hour
 71.76% is the volatile organic content of the ink in weight percent
 56.7 lbs. is the maximum quantity of solvent used in one hour
 100% is the volatile organic content of the solvent in weight percent
 95% is the 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.

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 NO_x from natural gas combustion in the ovens

Applicable Compliance Method

Compliance may be determined based upon the following calculation:

$$(100 \text{ lb NO}_x/\text{mmcf}) * (1,569 \text{ cf/hr})$$

where:

100 lb NO_x/mmcf is the AP-42 NO_x 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:

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

where:

Emissions Unit ID: **K011**

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 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).

- g. Emission Limitation
 The annual, individual and total hazardous air pollutant (HAP) emissions from all emissions units at this facility shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable Compliance Method

Compliance with these emission limitations shall be demonstrated through the records required pursuant to Section C.5 above.

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 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 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,

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

Facility ID: 0125041958

Emissions Unit ID: **K011**

where warranted, with prior approval from the Ohio EPA, CDO.

F. Miscellaneous Requirements

None

Column

PTI A

Issued: 2/14/2006

Emissions Unit ID: P001

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	OAC rule 3745-31-05(A)(3)	0.14 lb VOC/hr The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-35-07(B).
(Terms in this permit supercede those identified in PTI 01-08034 issued 11/17/99.)	OAC rule 3745-21-07(G)(2)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B) (synthetic minor to avoid TV)	See Sections A.2.a - A.2.c, A.2.f, B.1, B.2 and B.3 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 and HAP 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) 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.
- 2.f** The maximum annual HAP emissions for emissions units K009, K010, K011 and P001 shall not exceed 9.9 tons for individual HAPs and 24.9 tons for combined HAPs, based upon a rolling, 12-month summation of the HAP emissions.

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.

C. Monitoring and/or Record keeping 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 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 emissions units 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.

Emissions Unit ID: **P001**

4. The permittee shall collect and record the following information each month for emissions units K009, K010, K011 and P001:
- a. The name and identification number of each coating, as applied;
 - b. The individual HAP¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. The total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - d. The number of gallons of each coating employed;
 - e. The name and identification of each cleanup material employed;
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon cleanup material, as applied;
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum of all individual HAP contents from f);
 - h. The number of gallons of each cleanup material employed;
 - i. The total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material) multiplied by the control efficiency of the catalytic incinerator (1-0.95); and
 - j. The total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material) multiplied by the control efficiency of the catalytic incinerator (1-0.95).

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 field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

5. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. Changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.
7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. A description of the parameters changed (composition of materials, new

Emissions Unit ID: **P001**

pollutants emitted, change in stack/exhaust parameters, etc.);

- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall 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.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 quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.
5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The rolling, 12-month total individual HAP emission limitation; and
 - b. The rolling, 12-month total combined HAP emissions limitation.

These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

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

Emissions Unit ID: P001

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.

c. Emission Limitation

The annual, individual and total hazardous air pollutant (HAP) emissions from all emissions units at this facility shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable Compliance Method

Compliance with these emission limitations shall be demonstrated through the records required pursuant to Section C.4 above.

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 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 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

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

Facility ID: 0125041958

Emissions Unit ID: **P001**

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