State of Ohio Environmental Protection Agency

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

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 02-18894

DATE: 4/27/2004

International Paper
Don Rinehart
689 Palmer St.
Wooster, OH 44691

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

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 4/27/2004**
Terms and Conditions	**Effective Date: 4/27/2004**

FINAL PERMIT TO INSTALL 02-18894

Application Number:	02-18894
APS Premise Number:	0285030093
Permit Fee:	**$800**
Name of Facility:	International Paper
Person to Contact:	Don Rinehart
Address:	689 Palmer St. Wooster, OH 44691

Location of proposed air contaminant source(s) [emissions unit(s)]:
689 Palmer St.
Wooster, **Ohio**

Description of proposed emissions unit(s):
Ward Flexo-Folder-Gluer, a Ward Die Cutter, and a Starch silo.

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 recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources 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.

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

Pollutant	Tons Per Year
PE/PM10	0.03
VOC	99.9*
HAP (individual)	9.9*
HAP(combined)	9.9*

* Facility wide emission limitation

Emissions Unit ID: **K008**

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K008 - two (2) Ward rotary die cutters	OAC rule 3745-31-05(A)(3)	VOC: 100.31 lbs/hr, based on an average for each calendar month.
	OAC rule 3745-31-05 (C)	VOC: (facility wide) 16,650 lbs/month 99.9 tons per rolling 12-month period
		HAP: (facility wide) 9.9 tons per rolling 12-month period, individual or combined
	OAC rule 3745-21-09(F)	VOC: 2.9 lbs/gallon of coating, excluding water and exempt solvents.

2. Additional Terms and Conditions

2.a The terms and conditions of this permit provide sufficient federally enforceable emissions limits and recordkeeping to limit the facility's potential-to-emit below 10 tons of each individual HAP; thus, this facility is an area source for this MACT. If the rolling 12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63,Subpart KK, Printing and Publishing Industry, within 365 days after the exceedance. A 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.

2.b The permittee is required to maintain monthly recordkeeping of coating materials including cleanup materials, to demonstrate only compliant coating materials are being employed. If the permittee uses non-complying coating materials including cleanup materials, then daily record keeping must be performed to demonstrate compliance with the 2.9 pounds per gallon limitation, as a daily volume weighted average.

B. Operational Restrictions

1. The maximum coating material usage for K001, K002, K003, K004, K005, K006, K007, K008, and K009 combined shall not cause the emissions to exceed 99.9 tons of VOC per rolling, 12-month period, calculated using the following formula:

$$99.9 \text{ tons VOC} \geq \sum_{n=1}^{i} \frac{(P_i)x(VOC_i)}{2000}$$

where:

P_i = Usage of coating materials "i" in gallons or pounds (percent by mass weight of solvent contained within a gallon of coating material);

VOC_i = VOC content of coating materials "i" in pounds per gallon** or percent by weight;**
this assumes when using pounds per gallon or percent by weight units,** 100% of the organic solvent is emitted.

The permittee has existing production records such that there is no need for first year monthly VOC emissions limitations.

2. The permittee has existing production records such that there is no need for first year monthly HAP emissions limitations.

Monitoring and/or Recordkeeping Requirements

1. For purposes of determining compliance with the VOC emission limitation of 100.31 lbs. per hour and 2.9 lbs. per gallon of coating for this emissions unit and the monthly facility wide VOC emission limitation of 16,650 lbs per month and 99.9 tons per year for emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, the permittee shall collect and record the following information each month:

a. the identification of each ink and cleanup material employed;

b. the number of gallons of each such material employed;

c. the VOC content of each such material, in pounds per gallon;

d. the total VOC emissions from all such materials used in this emissions unit, in pounds per month;

e. the number of hours per month this emissions unit operated;

f. the average hourly VOC emissions from this emissions unit, {i.e., (d) / (e)}

g. the combined total VOC emissions from all material employed in emission units listed above, in pounds or tons per month

2. The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009:

a. the name and identification number of each ink, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each ink in pounds of individual HAP per gallon of ink, as applied;

c. the total combined HAP content for each HAP of each ink in pounds of combined HAPs per gallon of ink, as applied (sum all the individual HAP contents from b);

d. the number of gallons of each ink 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 of 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 all the individual HAP contents from f);

h. the number of gallons of each cleanup material employed; and,

i. the total combined HAP emissions from all inks and cleanup materials employed, in pounds or tons per month (the sum of c x d for each coating plus the sum of g x h for each cleanup material).

3. A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting the Ohio EPA, Northeast District Office. Material Safety Data Sheets typically include a listing

of the solvents contained in the inks or cleanup materials. This information does not have to be kept on a line-by-line basis.

Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:

   a. Each month during which the VOC emissions for this emissions unit exceeded 100.31 pounds per hour (average) and the actual VOC emissions for each such month (excluding cleanup materials).

   b. Each instance that the VOC content of material put into this emissions unit exceeded 2.9 pounds per gallon of coating, excluding water and exempt solvents and the permittee does not have daily record keeping verifying compliance with 2.9 pounds VOC per gallon of coating on a daily volume weighted average.

   c. Each month during which the total VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, combined, exceeded 16,650 lbs. per month and actual VOC emissions for each such month.

   d. Each month during which the total VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, combined, exceeded 99.9 tons per year as a rolling, 12-month summation and the actual VOC emissions for each such 12-month summation.

   e. Each month during which the total individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, combined, exceeded 9.9 tons per year as a rolling, 12-month summation and the actual HAP emissions for each such 12-month summation.

   f. Each month during which the total combined HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, combined, exceeded 9.9 tons per year as a rolling, 12-month summation and the actual total combined HAP emissions for each such 12-month summation.

2. The permittee shall submit annual reports that identify:

   a. The total VOC emissions from material and cleanup materials from this emissions unit.

   b. The total individual and combined HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009 combined.

Testing Requirements

Compliance with the allowable emissions limitations in section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:
   100.31 pounds of VOC per hour

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.

2. Emission Limitation:
   16,650 pounds of VOC per month (facility wide)

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.

3. Emission Limitation:
   99.9 pounds of VOC per hour (facility wide)

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.

4. Emission Limitation:
   9.9 tons of individual HAP per year (facility wide)

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.2.

5. Emission Limitation:
   9.9 tons of combined HAPs per year (facility wide)

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.2.

6. Emission Limitation:
   2.9 lbs. of VOC per gallon of coating material, excluding water and exempt solvents

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.

Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. In accordance with the provisions of OAC rule 3745-31-05, the following special terms and conditions of this permit to install are federally enforceable: A-F.

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

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K009 - two (2) Ward flexo-folder-gluers	OAC rule 3745-31-05(A)(3)	VOC: 130.49 lbs/hr, based on an average for each calendar month.
	OAC rule 3745-31-05 (C)	VOC: (facility wide) 16,650 lbs/month 99.9 tons per rolling 12-month period HAP: (facility wide) 9.9 tons per rolling 12-month period, individual or combined
	OAC rule 3745-21-09(F)	VOC: 2.9 lbs/gallon of coating, excluding water and exempt solvents.

2. Additional Terms and Conditions

2.a The terms and conditions of this permit provide sufficient federally enforceable emissions limits and record keeping to limit the facility's potential-to-emit below 10 tons of each individual HAP; thus, this facility is an area source for this MACT. If the rolling

12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the

requirements for a major source per 40 CFR Part 63,Subpart KK, Printing and Publishing Industry, within 365 days after the exceedance. A 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.

2.b The permittee is required to maintain monthly recordkeeping of coating materials including cleanup materials, to demonstrate only compliant coating materials are being employed. If the permittee uses non-complying coating materials including cleanup materials, then daily recordkeeping must be performed to demonstrate compliance with the 2.9 pounds per gallon limitation, as a daily volume weighted average.

B. Operational Restrictions

1. The maximum coating material usage for K001, K002, K003, K004, K005, K006, K007, K008, and K009 combined shall not cause the emissions to exceed 99.9 tons of VOC per rolling, 12-month period, calculated using the following formula:

$$99.9 \text{ tons VOC} \geq \sum_{n=1}^{i} \frac{(P_i)x(VOC_i)}{2000}$$

where:

P_i = Usage of coating materials "i" in gallons or pounds (percent by mass weight of solvent contained within a gallon of coating material);

VOC_i = VOC content of coating materials "i" in pounds per gallon** or percent by weight;**
**this assumes when using pounds per gallon or percent by weight units, 100% of the organic solvent is emitted.

The permittee has existing production records such that there is no need for first year monthly VOC emissions limitations.

2. The permittee has existing production records such that there is no need for first year monthly HAP emissions limitations.

C. Monitoring and/or Recordkeeping Requirements

1. For purposes of determining compliance with the VOC emission limitation of 130.49 lbs per hour and 2.9 lbs./gallon of coating for this emissions unit and the monthly facility wide VOC emission limitation of

16,650 lbs per month and 99.9 tons per year for emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, the permittee shall collect and record the following information each month:

a. the identification of each ink and cleanup material employed;

b. the number of gallons of each such material employed;

c. the VOC content of each such material, in pounds per gallon;

d. the total VOC emissions from all such materials used in this emissions unit, in pounds per month;

e. the number of hours per month this emissions unit operated;

f. the average hourly VOC emissions from this emissions unit, {i.e., (d) / (e)}

g. the combined total VOC emissions from all material employed in emission units listed above, in pounds or tons per month

2. The permittee shall collect and record the following information each month for emission units K001, K002, K003, K004, K005, K006, K007, K008, and K009:

a. the name and identification number of each ink, as applied;

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each ink in pounds of individual HAP per gallon of ink, as applied;

c. the total combined HAP content for each HAP of each ink in pounds of combined HAPs per gallon of ink, as applied (sum all the individual HAP contents from b);

d. the number of gallons of each ink 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 of 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 all the individual HAP contents from f);

h. the number of gallons of each cleanup material employed; and,

i. the total combined HAP emissions from all inks and cleanup materials employed, in pounds or tons per month (the sum of c x d for each coating plus the sum of g x h for each cleanup material).

3. A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting the Ohio EPA, Northeast District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the inks or cleanup materials. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:

   a. Each month during which the VOC emissions for this emissions unit exceeded 100.31 pounds per hour (average) and the actual VOC emissions for each such month (excluding cleanup materials).

   b. Each instance that the VOC content of material put into this emissions unit exceeded 2.9 pounds per gallon of coating, excluding water and exempt solvents and the permittee does not have daily record keeping verifying compliance with 2.9 pounds VOC per gallon of coating on a daily volume weighted average.

   c. Each month during which the total VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, combined, exceeded 16,650 lbs. per month and actual VOC emissions for each such month.

   d. Each month during which the total VOC emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, combined, exceeded 99.9 tons per year as a rolling, 12-month summation and the actual VOC emissions for each such 12-month summation.

   e. Each month during which the total individual HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, combined, exceeded 9.9 tons per year as a rolling, 12-month summation and the actual HAP emissions for each such 12-month summation.

   f. Each month during which the total combined HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009, combined, exceeded 9.9 tons per year as a rolling, 12-month summation and the actual total combined HAP emissions for each such 12-month summation.

2. The permittee shall submit annual reports that identify:

   a. The total VOC emissions from material and cleanup materials from this emissions unit.

   b. The total individual and combined HAP emissions from emissions units K001, K002, K003, K004, K005, K006, K007, K008, and K009 combined.

E. Testing Requirements

Compliance with the allowable emissions limitations in section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation:
   130.49 pounds of VOC per hour

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.

2. Emission Limitation:
   16,650 pounds of VOC per month (facility wide)

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.

3. Emission Limitation:
   99.9 pounds of VOC per hour (facility wide)

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.

4. Emission Limitation:
   9.9 tons of individual HAP per year (facility wide)

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.2.

5. Emission Limitation:
   9.9 tons of combined HAPs per year (facility wide)

   Applicable Compliance Method:
   Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.2.

6. Emission Limitation:
   2.9 lbs. of VOC per gallon of coating material, excluding water and exempt solvents

Applicable Compliance Method:
Compliance shall be based upon the Monitoring and/or Record Keeping requirements specified in Section C.1.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. In accordance with the provisions of OAC rule 3745-31-05, the following special terms and conditions of this permit to install are federally enforceable: A-F.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P005 - Bulk material handling starch storage silo with maximum space capacity of 103,000 lbs.	OAC rule 3745-31-05 (A)(3)	PE/PM10: 0.25 lb/hr, 0.03 tpy
	OAC rule 3745-17-11	See section A.2.a. below.
	OAC rule 3745-17-07(A)(1)	See section A.2.b. below.

2. Additional Terms and Conditions

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

2.b Visible particulate emission from the stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the stack(s) and fugitive egress point(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. whether the emissions are representative of normal operations;
   b. if the emissions are not representative of normal operations, the cause of the abnormal

emissions;

c. the total duration of any visible emissions incident; and

d. any corrective action(s) taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack(s) or fugitive egress point(s) serving this emissions unit and (b) describe any corrective actions (s) taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous six-month period.

E. Testing Requirements

Compliance with the emissions limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

1. Emission Limitation:

   0.25 pound or PE/PM10 per hour

   Applicable Compliance Method:

   Compliance shall be determine by using the following equation:

   E = A / B*C (1-D)

   where:
   E = PE/PM10 emissions in lb/hr
   A = loading capacity, 50,000 lbs/load
   B = loading time per load, 2 hours
   C = percentage of starch reaching control device during loading, 1% (company's assumption)
   D = baghouse removal control efficiency, 99.9% (furnished by company)

   If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 1-5.

2. Emission Limitation:

0.03 ton of PE/PM10 per year

Applicable Compliance Method:

Compliance shall be determine by using the following equation:

E = A / B*C*D(1-F) / 2000 lbs

where:
E = PE/PM10 emissions in lb/hr
A = loading capacity, 50,000 lbs/load
B = number of loads per week, 2 loads
C = number of weeks per year, 52 weeks
D = percentage of starch reaching control device during loading, 1% (company's assumption)
F = baghouse removal control efficiency, 99.9% (furnished by company)

3. Emission Limitation:

Visible particulate emissions from the starch silo storage stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the emissions unit identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05, the following special terms and conditions of this permit to install are federally enforceable: A-F.