



State of Ohio Environmental Protection Agency

Street Address:

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

Lazarus Gov.
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION**
WAYNE COUNTY
Application No: 02-13404

CERTIFIED MAIL

DATE: 11/16/2000

Buckeye Container
John E Switzer
PO Box 16 3350 Long Rd
Wooster, OH 446910016

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NEDO



Permit To Install
Terms and Conditions

Issue Date: 11/16/2000
Effective Date: 11/16/2000

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-13404

Application Number: **02-13404**
APS Premise Number: **0285030402**
Permit Fee: **\$600**
Name of Facility: **Buckeye Container**
Person to Contact: **John E Switzer**
Address: **PO Box 16 3350 Long Rd**
Wooster, OH 446910016

Location of proposed air contaminant source(s) [emissions unit(s)]:
3350 Long Rd
Wooster, OHIO

Description of modification:

Administrative modification of PTI #02-13404 to change the recordkeeping requirements from line-by-line to facility wide since they are using all complying coatings.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Buckeye Container
PTI Application: 02-13404
Date: November 16, 2000

Facility ID: 0285030402

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 Related to Monitoring and Recordkeeping 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

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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

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Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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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	22.02
PM	14.45

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Date:

Facility ID: **0285030402**

Emissions Unit ID: **K001**

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>	
66"X 85" 4-Color Flexographic Rotary Die Cutter with Baghouse	OAC rule 3745-31-05 (A)(3)	40 CFR Part 63 Subpart KK

OAC rule 3745-17-11

OAC rule 3745-17-07

OAC rule 3745-21-09 (Y)(1)(a)(ii)

BuckePTI A₁**Date: November 16, 2000**Emissions Unit ID: **K001**

Applicable Emissions
Limitations/Control Measures

VOC emissions from this emissions unit shall not exceed 3.95 tons per year, including VOC from cleanup material.

Particulate emissions from baghouse shall not exceed 0.0075 grain per dry cubic foot of exhaust gas flow (3.30 pounds per hour) and 14.45 tons per year. See A.2.a of these terms and conditions.

There shall be no visible particulate emissions from any opening of the building.

The particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

The visible particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

Volatile organic compound (VOC) content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

See sections A.2.b - A.2.e of these terms and conditions.

2. Additional Terms and Conditions

2.a This represents the combined allowable particulate emissions for emissions units K001, K002, K003, K004, and K005.

2.b The permittee has chosen to commit to, and to meet the following criteria for the purposes of establishing the facility to be an area source:

i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.

ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.

2.c The following material may be excluded for HAP usage:

i. Used in routine janitorial or facility grounds maintenance;

ii. Personal uses by employees or other persons;

iii. The use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility; and

iv. The use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (whether used as compressed air or for combustion).

2.d If the permittee subsequently exceeds either of the thresholds, as specified in section A.2.b of these terms and conditions, for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), it shall be considered in violation and shall be a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the permittee shall be subject to the Title V requirement and the requirement as specified in §63.820 (a)(1) of 40 CFR part 63, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in section A.2.b of these terms and conditions.

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Facility ID: **0285030402**Emissions Unit ID: **K001**

- 2.e** If the facility, no longer being subject to section A.2.b of these terms and conditions, becomes a major source, the permittee must continue to comply with the HAP usage limitation as specified in section A.2.b of these terms and conditions until the facility is in compliance with all relevant requirements as specified in 40 CFR part 63 subpart KK.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5.0 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating and ink, as applied.
 - b. The VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

2. The permittee shall collect and record the following information each year for emissions units K001, K002, K003, K004, and K005
 - a. The name and identification of each coating, ink and cleanup material employed.
 - b. The VOC content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The number of gallons of each coating, ink, and cleanup material employed.
 - d. The VOC emissions from each coating, ink, and cleanup material.
 - e. The total VOC emissions from all coatings, inks, and cleanup materials, in tons per year.
3. The permittee shall collect and record the following information each month for the facility:

- a. The name and identification of each coating, ink and cleanup material employed.
 - b. Each single HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The combination HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - d. The number of gallons of each coating, ink, and cleanup material employed, in gallons per month.
 - e. The emissions of each single HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - f. The emissions of the combination HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - g. The total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - h. The total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - i. The rolling 12-month total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
 - j. The rolling 12-month total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
4. The permittee shall keep a log of annual production rate (i.e. million square feet of material coated) for this emissions unit and for emissions units K001, K002, K003, K004, and K005.
 5. Formulation data shall be used to determine the HAP(s) contents of the coatings, inks, and cleanup materials.
 6. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

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7. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the day the deviation occurred. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
3. The permittee shall submit annual reports which summarize the annual VOC emissions from this emissions unit, the rolling 12-month emissions of each single HAP and the combination of HAP from the facility. The report shall include the emission calculations, and shall be submitted by February 1 of each year.
4. The permittee shall notify the Administrator of USEPA (the Director of Air and Radiation Division, USEPA, Region V), in writing, that the facility is subject to the 40 CFR Part 63, subpart KK. The notification shall provide the following information:

- a. the name and address of the owner or operator;
- b. the address (i.e., physical location) of the facility;
- c. an identification of the relevant standard, or other requirement, that is the basis of the notification and the compliance date for this emissions unit;
- d. a brief description of the nature, size, design, and method of operation of this emissions unit, including its operating design capacity and an identification of each point of emission for each HAP; and
- e. a statement of whether the facility is a major source or an area source.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
3.95 tons/year of VOC

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.2 and C.4 of these terms and conditions and shall be calculated by the following equation:

$$E = TVOC \times PU/PF$$

Where:

E = total VOC emissions from this emissions unit, in tons per year

TVOC = total VOC emissions from emissions units K001, K002, K003, K004, and K005, in tons per year

PU = annual production rate for this emissions unit, in millions of square feet of material coated

PF = annual production rate for emissions units K001, K002, K003, K004, and K005, in millions of square feet of material coated

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Date: .

Facility ID: **0285030402**Emissions Unit ID: **K001**

- b. Emission Limitation:
0.0075 gr/ft³ (3.30 pound/hour) of PM
- Applicable Compliance Method:
- Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10).
- c. Emission Limitation:
14.45 tons/year of PM for emissions units K001, K002, K003, K004, and K005 combined
- Applicable Compliance Method:
- The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8763 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
- d. Emission Limitation:
No visible emissions from any building openings
- Applicable Compliance Method:
- Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(3).
- e. Emission Limitation:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied
- Applicable Compliance Method:
- Compliance shall be determined based upon the record keeping requirements specified in Section C.1 of these terms and conditions. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks.

f. Emission Limitation:

< 10 tons per rolling 12-month period of each single HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.3 of these terms and conditions.

g. Emission Limitation:

< 25 tons per rolling 12-month period of the combination HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C. 3 of these terms and conditions.

F. Miscellaneous Requirements1. Air Toxic Policy Clarifying Language

This permit allows the use of materials (coatings, inks and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

a. Pollutant: Ammonia

TLV (ug/m³): 17,000

Maximum Hourly Emission Rate (lbs/hr): 0.11275

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 397.26

MAGLC (ug/m³): 404.76

- b. Pollutant: Ethanol

TLV (ug/m³): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 0.6314

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2224.63

MAGLC (ug/m³): 44,761.904

- c. Pollutant: Monoethanolamine

TLV (ug/m³): 7,500

Maximum Hourly Emission Rate (lbs/hr): 0.0451

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 158.9

MAGLC (ug/m³): 178.57

2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would

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Date:

Facility ID: **0285030402**Emissions Unit ID: **K001**

result in the emission of an air contaminant not previously permitted; and

- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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PTI A₁

Date: November 16, 2000

Emissions Unit ID: **K002**

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

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>	
60"X 110" 2-Color Press with Baghouse	OAC rule 3745-31-05 (A)(3)	40 CFR Part 63 Subpart KK
	OAC rule 3745-17-11	
	OAC rule 3745-17-07	
	OAC rule 3745-21-09 (Y)(1)(a)(ii)	

BuckePTI A₁**Date: November 16, 2000**Emissions Unit ID: **K002**

Applicable Emissions
Limitations/Control Measures

VOC emissions from this emissions unit shall not exceed 3.95 tons per year, including VOC from cleanup material.

Particulate emissions from baghouse shall not exceed 0.0075 grain per dry cubic foot of exhaust gas flow (3.30 pounds per hour) and 14.45 tons per year. See A.2.a of these terms and conditions.

There shall be no visible particulate emissions from any opening of the building.

The particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

The visible particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

Volatile organic compound (VOC) content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

See sections A.2.b - A.2.e of these terms and conditions.

2. Additional Terms and Conditions

- 2.a** This represents the combined allowable particulate emissions for emissions units K001, K002, K003, K004, and K005.
- 2.b** The permittee has chosen to commit to, and to meet the following criteria for the purposes of establishing the facility to be an area source:
- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.
- 2.c** The following material may be excluded for HAP usage:
- i. Used in routine janitorial or facility grounds maintenance;
 - ii. Personal uses by employees or other persons;
 - iii. The use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility; and
 - iv. The use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (whether used as compressed air or for combustion).
- 2.d** If the permittee subsequently exceeds either of the thresholds, as specified in section A.2.b of these terms and conditions, for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), it shall be considered in violation and shall be a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the permittee shall be subject to the Title V requirement and the requirement as specified in §63.820 (a)(1) of 40 CFR part 63, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in section

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Date: .

Facility ID: **0285030402**Emissions Unit ID: **K002**

A.2.b of these terms and conditions.

- 2.e** If the facility, no longer being subject to section A.2.b of these terms and conditions, becomes a major source, the permittee must continue to comply with the HAP usage limitation as specified in section A.2.b of these terms and conditions until the facility is in compliance with all relevant requirements as specified in 40 CFR part 63 subpart KK.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5.0 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating and ink, as applied.
 - b. The VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

2. The permittee shall collect and record the following information each year for emissions units K001, K002, K003, K004, and K005
 - a. The name and identification of each coating, ink and cleanup material employed.
 - b. The VOC content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The number of gallons of each coating, ink, and cleanup material employed.
 - d. The VOC emissions from each coating, ink, and cleanup material.
 - e. The total VOC emissions from all coatings, inks, and cleanup materials, in tons per year.
3. The permittee shall collect and record the following information each month for the facility:

- a. The name and identification of each coating, ink and cleanup material employed.
 - b. Each single HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The combination HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - d. The number of gallons of each coating, ink, and cleanup material employed, in gallons per month.
 - e. The emissions of each single HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - f. The emissions of the combination HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - g. The total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - h. The total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - i. The rolling 12-month total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
 - j. The rolling 12-month total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
4. The permittee shall keep a log of annual production rate (i.e. million square feet of material coated) for this emissions unit and for emissions units K001, K002, K003, K004, and K005.
 5. Formulation data shall be used to determine the HAP(s) contents of the coatings, inks, and cleanup materials.
 6. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure

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drop across the baghouse on weekly basis.

7. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
3. The permittee shall submit annual reports which summarize the annual VOC emissions from this emissions unit, the rolling 12-month emissions of each single HAP and the combination of HAP from the facility. The report shall include the emission calculations, and shall be submitted by February 1 of each year.
4. The permittee shall notify the Administrator of USEPA (the Director of Air and Radiation Division, USEPA, Region V), in writing, that the facility is subject to the 40 CFR Part 63, subpart KK. The notification shall provide the following information:
 - a. the name and address of the owner or operator;

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- b. the address (i.e., physical location) of the facility;
- c. an identification of the relevant standard, or other requirement, that is the basis of the notification and the compliance date for this emissions unit;
- d. a brief description of the nature size, design, and method of operation of this emissions unit, including its operating design capacity and an identification of each point of emission for each HAP; and
- e. a statement of whether the facility is a major source or an area source.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

3.95 tons/year of VOC

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C. 2 and C.4 of these terms and conditions and shall be calculated by following:

$$E = TVOC \times PU/PF$$

Where:

E = total VOC emissions from this emissions unit, in tons per year.

TVOC = total VOC emissions from emissions units K001, K002, K003, K004, and K005, in tons per year.

PU = annual production rate for this emissions unit, in million square foot.

PF = annual production rate for emissions units K001, K002, K003, K004, and K005, in million square foot.

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- b. Emission Limitation:
- 0.0075 grain/ft³ (3.30 pound/hour) of PM
- Applicable Compliance Method:
- Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10).
- c. Emission Limitation:
- 14.45 tons/year of PM \for emissions units K001, K002, K003, K004, and K005 combined
- Applicable Compliance Method:
- The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8763 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
- d. Emission Limitation:
- No visible emissions from any building opening
- Applicable Compliance Method:
- Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(3).
- e. Emission Limitation:
- VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied
- Applicable Compliance Method:
- Compliance shall be determined based upon the record keeping requirements specified in Section C.1 of these terms and conditions. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks.
- f. Emission Limitation:

< 10 tons per rolling 12-month period of each single HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.3 of these terms and conditions.

g. Emission Limitation:

< 25 tons per rolling 12-month period of the combination HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C. 3 of these terms and conditions.

F. Miscellaneous Requirements

1. Air Toxic Policy Clarifying Language

This permit allows the use of materials (coatings, inks and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

a. Pollutant: Ammonia

TLV (ug/m³): 17,000

Maximum Hourly Emission Rate (lbs/hr): 0.11275

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 397.26

MAGLC (ug/m³): 404.76

- b. Pollutant: Ethanol

TLV (ug/m³): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 0.6314

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2224.63

MAGLC (ug/m³): 44,761.904

- c. Pollutant: Monoethanolamine

TLV (ug/m³): 7,500

Maximum Hourly Emission Rate (lbs/hr): 0.0451

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 158.9

MAGLC (ug/m³): 178.57

2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

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- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
 4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Applicable Emissions
Limitations/Control Measures

VOC emissions from this emissions unit shall not exceed 2.98 tons per year, including VOC from cleanup material.

Particulate emissions from baghouse shall not exceed 0.0075 grain per dry cubic foot of exhaust gas flow (3.30 pounds per hour) and 14.45 tons per year. See A.2.a of these terms and conditions.

There shall be no visible particulate emissions from any opening of the building.

The particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

The visible particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

Volatile organic compound (VOC) content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

See sections A.2.b - A.2.e of these terms and conditions.

2. Additional Terms and Conditions

- 2.a** This represents the combined allowable particulate emissions for emissions units K001, K002, K003, K004, and K005.
- 2.b** The permittee has chosen to commit to, and to meet the following criteria for the purposes of establishing the facility to be an area source:
- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.
- 2.c** The following material may be excluded for HAP usage:
- i. Used in routine janitorial or facility grounds maintenance;
 - ii. Personal uses by employees or other persons;
 - iii. The use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility; and
 - iv. The use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (whether used as compressed air or for combustion).
- 2.d** If the permittee subsequently exceeds either of the thresholds, as specified in section A.2.b of these terms and conditions, for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), it shall be considered in violation and shall be a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the permittee shall be subject to the Title V requirement and the requirement as specified in §63.820 (a)(1) of 40 CFR part 63, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in section

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Facility ID: **0285030402**Emissions Unit ID: **K003**

A.2.b of these terms and conditions.

- 2.e** If the facility, no longer being subject to section A.2.b of these terms and conditions, becomes a major source, the permittee must continue to comply with the HAP usage limitation as specified in section A.2.b of these terms and conditions until the facility is in compliance with all relevant requirements as specified in 40 CFR part 63 subpart KK.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5.0 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating and ink, as applied.
 - b. The VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

2. The permittee shall collect and record the following information each year for emissions units K001, K002, K003, K004, and K005
 - a. The name and identification of each coating, ink and cleanup material employed.
 - b. The VOC content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The number of gallons of each coating, ink, and cleanup material employed.
 - d. The VOC emissions from each coating, ink, and cleanup material.
 - e. The total VOC emissions from all coatings, inks, and cleanup materials, in tons per year.
3. The permittee shall collect and record the following information each month for the facility:

- a. The name and identification of each coating, ink and cleanup material employed.
 - b. Each single HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The combination HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - d. The number of gallons of each coating, ink, and cleanup material employed, in gallons per month.
 - e. The emissions of each single HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - f. The emissions of the combination HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - g. The total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - h. The total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - i. The rolling 12-month total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
 - j. The rolling 12-month total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
4. The permittee shall keep a log of annual production rate (i.e. million square feet of material coated) for this emissions unit and for emissions units K001, K002, K003, K004, and K005.
 5. Formulation data shall be used to determine the HAP(s) contents of the coatings, inks, and cleanup materials.
 6. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure

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drop across the baghouse on weekly basis.

7. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
3. The permittee shall submit annual reports which summarize the annual VOC emissions from this emissions unit, the rolling 12-month emissions of each single HAP and the combination of HAP from the facility. The report shall include the emission calculations, and shall be submitted by February 1 of each year.
4. The permittee shall notify the Administrator of USEPA (the Director of Air and Radiation Division, USEPA, Region V), in writing, that the facility is subject to the 40 CFR Part 63, subpart KK. The notification shall provide the following information:
 - a. the name and address of the owner or operator;

- b. the address (i.e., physical location) of the facility;
- c. an identification of the relevant standard, or other requirement, that is the basis of the notification and the compliance date for this emissions unit;
- d. a brief description of the nature size, design, and method of operation of this emissions unit, including its operating design capacity and an identification of each point of emission for each HAP; and
- e. a statement of whether the facility is a major source or an area source.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

2.98 tons/year of VOC

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.2 and C.4 of these terms and conditions and shall be calculated by following:

$$E = TVOC \times PU/PF$$

Where:

E = total VOC emissions from this emissions unit, in tons per year.

TVOC = total VOC emissions from emissions units K001, K002, K003, K004, and K005, in tons per year.

PU = annual production rate for this emissions unit, in million square foot.

PF = annual production rate for emissions units K001, K002, K003, K004, and K005, in million square foot.

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- b. Emission Limitation:
- 0.0075 grain/ft³ (3.30 pound/hour) of PM
- Applicable Compliance Method:
- Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10).
- c. Emission Limitation:
- 14.45 tons/year of PM for emissions units K001, K002, K003, K004, and K005 combined
- Applicable Compliance Method:
- The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8763 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
- d. Emission Limitation:
- No visible emissions from any building opening
- Applicable Compliance Method:
- Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(3).
- e. Emission Limitation:
- VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied
- Applicable Compliance Method:
- Compliance shall be determined based upon the record keeping requirements specified in Section C.1 of these terms and conditions. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks.

f. Emission Limitation:

< 10 tons per rolling 12-month period of each single HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.3 of these terms and conditions.

g. Emission Limitation:

< 25 tons per rolling 12-month period of the combination HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.3 of these terms and conditions.

F. Miscellaneous Requirements1. Air Toxic Policy Clarifying Language

This permit allows the use of materials (coatings, inks and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

a. Pollutant: Ammonia

TLV (ug/m³): 17,000

Maximum Hourly Emission Rate (lbs/hr): 0.11275

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 397.26

MAGLC (ug/m³): 404.76

- b. Pollutant: Ethanol

TLV (ug/m³): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 0.6314

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2224.63

MAGLC (ug/m³): 44,761.904

- c. Pollutant: Monoethanolamine

TLV (ug/m³): 7,500

Maximum Hourly Emission Rate (lbs/hr): 0.0451

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 158.9

MAGLC (ug/m³): 178.57

2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would

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result in the emission of an air contaminant not previously permitted; and

- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Date: November 16, 2000

Emissions Unit ID: **K004**

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

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>	
66"X 85" 2-Color Flexographic Rotary Die Cutter with Baghouse	OAC rule 3745-31-05 (A)(3)	40 CFR Part 63 Subpart KK
	OAC rule 3745-17-11	
	OAC rule 3745-17-07	
	OAC rule 3745-21-09 (Y)(1)(a)(ii)	

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Applicable Emissions
Limitations/Control Measures

VOC emissions from this emissions unit shall not exceed 3.95 tons per year, including VOC from cleanup material.

Particulate emissions from baghouse shall not exceed 0.0075 grain per dry cubic foot of exhaust gas flow (3.30 pounds per hour) and 14.45 tons per year. See A.2.a of these terms and conditions.

There shall be no visible particulate emissions from any opening of the building.

The particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

The visible particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

Volatile organic compound (VOC) content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

See sections A.2.b - A.2.e of these terms and conditions.

2. Additional Terms and Conditions

- 2.a** This represents the combined allowable particulate emissions for emissions units K001, K002, K003, K004, and K005.
- 2.b** The permittee has chosen to commit to, and to meet the following criteria for the purposes of establishing the facility to be an area source:
- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.
- 2.c** The following material may be excluded for HAP usage:
- i. Used in routine janitorial or facility grounds maintenance;
 - ii. Personal uses by employees or other persons;
 - iii. The use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility; and
 - iv. The use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (whether used as compressed air or for combustion).
- 2.d** If the permittee, subsequently exceeds either of the thresholds, as specified in section A.2.b of these terms and conditions, for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation and shall be a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the permittee shall be subject to the Title V requirement and the requirement as specified in §63.820 (a)(1) of 40 CFR part 63, even if in subsequent 12-month periods the facility uses less HAP than the

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thresholds in section A.2.b of these terms and conditions.

- 2.e** If the facility, no longer being subject to section A.2.b of these terms and conditions, becomes a major source, the permittee must continue to comply with the HAP usage limitation as specified in section A.2.b of these terms and conditions until the facility is in compliance with all relevant requirements as specified in 40 CFR part 63 subpart KK.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5.0 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating and ink, as applied.
 - b. The VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

2. The permittee shall collect and record the following information each year for emissions units K001, K002, K003, K004, and K005
 - a. The name and identification of each coating, ink and cleanup material employed.
 - b. The VOC content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The number of gallons of each coating, ink, and cleanup material employed.
 - d. The VOC emissions from each coating, ink, and cleanup material.
 - e. The total VOC emissions from all coatings, inks, and cleanup materials, in tons per year.
3. The permittee shall collect and record the following information each month for the facility:

- a. The name and identification of each coating, ink and cleanup material employed.
 - b. Each single HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The combination HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - d. The number of gallons of each coating, ink, and cleanup material employed, in gallons per month.
 - e. The emissions of each single HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - f. The emissions of the combination HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - g. The total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - h. The total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - i. The rolling 12-month total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
 - j. The rolling 12-month total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
4. The permittee shall keep a log of annual production rate (i.e. million square feet of material coated) for this emissions unit and for emissions units K001, K002, K003, K004, and K005.
 5. Formulation data shall be used to determine the HAP(s) contents of the coatings, inks, and cleanup materials.
 6. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure

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drop across the baghouse on weekly basis.

7. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
3. The permittee shall submit annual reports which summarize the annual VOC emissions from this emissions unit, the rolling 12-month emissions of each single HAP and the combination of HAP from the facility. The report shall include the emission calculations, and shall be submitted by February 1 of each year.
4. The permittee shall notify the Administrator of USEPA (the Director of Air and Radiation Division, USEPA, Region V), in writing, that the facility is subject to the 40 CFR Part 63, subpart KK. The notification shall provide the following information:
 - a. the name and address of the owner or operator;

- b. the address (i.e., physical location) of the facility;
- c. an identification of the relevant standard, or other requirement, that is the basis of the notification and the compliance date for this emissions unit;
- d. a brief description of the nature size, design, and method of operation of this emissions unit, including its operating design capacity and an identification of each point of emission for each HAP; and
- e. a statement of whether the facility is a major source or an area source.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

3.95 tons/year of VOC

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.2 and C.4 of these terms and conditions and shall be calculated by following:

$$E = TVOC \times PU/PF$$

Where:

E = total VOC emissions from this emissions unit, in tons per year.

TVOC = total VOC emissions from emissions units K001, K002, K003, K004, and K005, in tons per year.

PU = annual production rate for this emissions unit, in million square foot.

PF = annual production rate for emissions units K001, K002, K003, K004, and K005, in million square foot.

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- b. Emission Limitation:
- 0.0075 grain/ft³ (3.30 pound/hour) of PM
- Applicable Compliance Method:
- Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10).
- c. Emission Limitation:
- 14.45 tons/year of PM for emissions units K001, K002, K003, K004, and K005 combined
- Applicable Compliance Method:
- The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8763 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.
- d. Emission Limitation:
- No visible emissions from any building opening
- Applicable Compliance Method:
- Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(3).
- e. Emission Limitation:
- VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied
- Applicable Compliance Method:
- Compliance shall be determined based upon the record keeping requirements specified in Section C.1 of these terms and conditions. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks.

f. Emission Limitation:

< 10 tons per rolling 12-month period of each single HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.3 of these terms and conditions.

g. Emission Limitation:

< 25 tons per rolling 12-month period of the combination HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.3 of these terms and conditions.

F. Miscellaneous Requirements1. Air Toxic Policy Clarifying Language

This permit allows the use of materials (coatings, inks and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

a. Pollutant: Ammonia

TLV (ug/m³): 17,000

Maximum Hourly Emission Rate (lbs/hr): 0.11275

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 397.26

MAGLC (ug/m³): 404.76

- b. Pollutant: Ethanol

TLV (ug/m³): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 0.6314

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2224.63

MAGLC (ug/m³): 44,761.904

- c. Pollutant: Monoethanolamine

TLV (ug/m³): 7,500

Maximum Hourly Emission Rate (lbs/hr): 0.0451

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 158.9

MAGLC (ug/m³): 178.57

2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would

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result in the emission of an air contaminant not previously permitted; and

- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Applicable Emissions
Limitations/Control Measures

VOC emissions from this emissions unit shall not exceed 4.95 tons per year, including VOC from cleanup material.

Particulate emissions from baghouse shall not exceed 0.0075 grain per dry cubic foot of exhaust gas flow (3.30 pounds per hour) and 14.45 tons per year. See A.2.a of these terms and conditions.

There shall be no visible particulate emissions from any opening of the building.

The particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

The visible particulate emission limit based on this rule is less stringent than the limit based on OAC rule 3745-31-05 (A)(3).

Volatile organic compound (VOC) content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

See sections A.2.b - A.2.e of these terms and conditions.

2. Additional Terms and Conditions

- 2.a** This represents the combined allowable particulate emissions for emissions units K001, K002, K003, K004, and K005.
- 2.b** The permittee has chosen to commit to, and to meet the following criteria for the purposes of establishing the facility to be an area source:
- i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.
 - ii. Use less than 22.7 Mg (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.
- 2.c** The following material may be excluded for HAP usage:
- i. Used in routine janitorial or facility grounds maintenance;
 - ii. Personal uses by employees or other persons;
 - iii. The use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility; and
 - iv. The use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (whether used as compressed air or for combustion).
- 2.d** If the permittee subsequently exceeds either of the thresholds, as specified in section A.2.b of these terms and conditions, for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), it shall be considered in violation and shall be a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the permittee shall be subject to the Title V requirement and the requirement as specified in §63.820 (a)(1) of 40 CFR part 63, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in section A.2.b of these terms and conditions.

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- 2.e** If the facility, no longer being subject to section A.2.b of these terms and conditions, becomes a major source, the permittee must continue to comply with the HAP usage limitation as specified in section A.2.b of these terms and conditions until the facility is in compliance with all relevant requirements as specified in 40 CFR part 63 subpart KK.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5.0 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating and ink, as applied.
 - b. The VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, as applied [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$].

This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

2. The permittee shall collect and record the following information each year for emissions units K001, K002, K003, K004, and K005
 - a. The name and identification of each coating, ink and cleanup material employed.
 - b. The VOC content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The number of gallons of each coating, ink, and cleanup material employed.
 - d. The VOC emissions from each coating, ink, and cleanup material.
 - e. The total VOC emissions from all coatings, inks, and cleanup materials, in tons per year.
3. The permittee shall collect and record the following information each month for the facility:
 - a. The name and identification of each coating, ink and cleanup material employed.

- b. Each single HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The combination HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - d. The number of gallons of each coating, ink, and cleanup material employed, in gallons per month.
 - e. The emissions of each single HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - f. The emissions of the combination HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - g. The total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - h. The total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - i. The rolling 12-month total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
 - j. The rolling 12-month total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
4. The permittee shall keep a log of annual production rate (i.e. million square feet of material coated) for this emissions unit and for emissions units K001, K002, K003, K004, and K005.
 5. Formulation data shall be used to determine the HAP(s) contents of the coatings, inks, and cleanup materials.
 6. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on weekly basis.

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7. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section B.1 of these terms and conditions. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year. The report shall be submitted by February 1 of each year.
3. The permittee shall submit annual reports which summarize the annual VOC emissions from this emissions unit, the rolling 12-month emissions of each single HAP and the combination of HAP from the facility. The report shall include the emission calculations, and shall be submitted by February 1 of each year.
4. The permittee shall notify the Administrator of USEPA (the Director of Air and Radiation Division, USEPA, Region V), in writing, that the facility is subject to the 40 CFR Part 63, subpart KK. The notification shall provide the following information:
 - a. the name and address of the owner or operator;
 - b. the address (i.e., physical location) of the facility;

- c. an identification of the relevant standard, or other requirement, that is the basis of the notification and the compliance date for this emissions unit;
- d. a brief description of the nature size, design, and method of operation of this emissions unit, including its operating design capacity and an identification of each point of emission for each HAP; and
- e. a statement of whether the facility is a major source or an area source.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

4.95 tons/year of VOC

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.2 and C.4 of these terms and conditions and shall be calculated by following:

$$E = \text{TVOC} \times \text{PU/PF}$$

Where:

E = total VOC emissions from this emissions unit, in tons per year.

TVOC = total VOC emissions from emissions units K001, K002, K003, K004, and K005, in tons per year.

PU = annual production rate for this emissions unit, in million square foot.

PF = annual production rate for emissions units K001, K002, K003, K004, and K005, in million square foot.

- b. Emission Limitation:

0.0075 grain/ft³ (3.30 pound/hour) of PM

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Applicable Compliance Method:

Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(10).

c. Emission Limitation:

14.45 tons/year of PM for emissions units K001, K002, K003, K004, and K005 combined

Applicable Compliance Method:

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8763 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

d. Emission Limitation:

No visible emissions from any building opening

Applicable Compliance Method:

Compliance shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03 (B)(3).

e. Emission Limitation:

VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.1 of these terms and conditions. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks.

f. Emission Limitation:

< 10 tons per rolling 12-month period of each single HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.3 of these terms and conditions.

g. Emission Limitation:

< 25 tons per rolling 12-month period of the combination HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.3 of these terms and conditions.

F. Miscellaneous Requirements1. Air Toxic Policy Clarifying Language

This permit allows the use of materials (coatings, inks and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

a. Pollutant: Ammonia

TLV (ug/m³): 17,000

Maximum Hourly Emission Rate (lbs/hr): 0.11275

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 397.26

MAGLC (ug/m³): 404.76

- b. Pollutant: Ethanol
- TLV (ug/m³): 1,880,000
- Maximum Hourly Emission Rate (lbs/hr): 0.6314
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2224.63
- MAGLC (ug/m³): 44,761.904
- c. Pollutant: Monoethanolamine
- TLV (ug/m³): 7,500
- Maximum Hourly Emission Rate (lbs/hr): 0.0451
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 158.9
- MAGLC (ug/m³): 178.57

2. 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

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3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

4. For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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Date: November 16, 2000

Emissions Unit ID: **K006****PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****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>
Automatan Litho Laminator	OAC rule 3745-31-05 (A)(3)	VOC emissions from this emissions unit shall not exceed 2.24 tons per year, including VOC from cleanup material.
	OAC rule 3745-21-09 (F)	Volatile organic compound (VOC) content of each coating shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	40 CFR Part 63 Subpart KK	See sections A.2.a - A.2.d of these terms and conditions.

2. Additional Terms and Conditions

- 2.a The permittee chooses to commit to, and meet the following criteria for the purposes of establishing the facility to be an area source:
 - i. Use less than 9.1 Mg (10 tons) per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.

- ii. Use less than 22.7 MG (25 tons) per each rolling 12-month period of any combination of HAP at the facility, including materials used for all publication rotogravure product, packaging rotogravure, and wide-web flexographic printing presses, as defined in 40 CFR part 63, subpart KK, or purposes other than printing and publishing.

2.b The following material may be excluded for HAP usage:

- i. Used in routine janitorial or facility grounds maintenance;
- ii. Personal uses by employees or other persons;
- iii. The use of products for the purpose of maintaining electric, propane, gasoline and diesel powered motor vehicles operated by the facility; and
- iv. The use of HAP contained in intake water (used for processing or noncontact cooling) or intake air (whether used as compressed air or for combustion).

2.c The permittee, subsequently exceeds either of the thresholds, as specified in section A.2.b of these terms and conditions, for any rolling 12-month period (without first obtaining and complying with other limits that keep its potential to emit HAP below major source levels), shall be considered in violation and shall be a major source of HAP beginning the first month after the end of the 12-month period in which either of the HAP-use thresholds was exceeded. As a major source of HAP, the permittee shall be subject to the Title V requirement and the requirement as specified in §63.820 (a)(1) of 40 CFR part 63, even if in subsequent 12-month periods the facility uses less HAP than the thresholds in section A.2.b of these terms and conditions.

2.d If the facility, no longer being subject to section A.2.b of these terms and conditions, becomes a major source, the permittee must continue to comply with the HAP usage limitation as specified in section A.2.b of these terms and conditions until the facility is in compliance with all relevant requirements as specified in 40 CFR part 63 subpart KK.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions

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unit:

- a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), ink, and cleanup material, in pounds per gallon.
 - c. The number of gallons of each coating, ink, and cleanup material employed.
 - d. The VOC emissions from each coating, ink, and cleanup material.
 - e. The total VOC emissions from all coatings, inks, and cleanup materials, in pounds or tons per month.
2. The permittee shall collect and record the following information each month for the facility:
- a. The name and identification of each coating, ink and cleanup material employed.
 - b. Each single HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - c. The combination HAP content of each coating, ink, and cleanup material, in pounds per gallon.
 - d. The number of gallons of each coating, ink, and cleanup material employed, in gallons per month.
 - e. The emissions of each single HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - f. The emissions of the combination HAP from each coating, ink, and cleanup material employed, in pounds per month.
 - g. The total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - h. The total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds per month.
 - i. The rolling 12-month total emissions of each single HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.

- j. The rolling 12-month total emissions of the combination HAP from all coatings, inks, and cleanup materials employed, in pounds or tons per rolling 12-month period.
3. Formulation data shall be used to determine the HAP(s) contents of the coatings, inks, and cleanup materials.
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which summarize the annual VOC emissions from this emissions unit, the rolling 12-month emissions of each single HAP and the combination of HAP from the facility. The report shall include the emission calculations, and shall be submitted by February 1 of each year.
3. The permittee shall notify the Administrator of USEPA (the Director of Air and Radiation Division, USEPA, Region V), in writing, that the facility is subject to the 40 CFR Part 63, subpart KK. The notification shall provide the following information:
 - a. the name and address of the owner or operator;

- b. the address (i.e., physical location) of the facility;
- c. an identification of the relevant standard, or other requirement, that is the basis of the notification and the compliance date for this emissions unit;
- d. a brief description of the nature size, design, and method of operation of this emissions unit, including its operating design capacity and an identification of each point of emission for each HAP; and
- e. a statement of whether the facility is a major source or an area source.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

2.24 tons/year of VOC

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.1 of these terms and conditions and shall be the sum of the monthly VOC emission rates for the calendar year.
 - b. Emission Limitation:

2.9 pounds VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.1 of these terms and conditions. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks.
 - c. Emission Limitation:

< 10 tons per rolling 12-month period of each single HAP from the facility

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Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.2 of these terms and conditions.

d. Emission Limitation:

< 25 tons per rolling 12-month period of the combination HAP from the facility

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in Section C.2 of these terms and conditions.

F. Miscellaneous Requirements

1. Air Toxic Policy Clarifying Language

Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since 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 result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.