



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

5/25/2012

Melinda Bird
Burrows Paper Corporation
501 West Main street
Little Falls, NY 13365

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483040446
Permit Number: P0109621
Permit Type: Renewal
County: Warren

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Burrows Paper Corporation**

Facility ID:	1483040446
Permit Number:	P0109621
Permit Type:	Renewal
Issued:	5/25/2012
Effective:	5/25/2012
Expiration:	4/7/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
Burrows Paper Corporation

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Authorization

Facility ID: 1483040446

Application Number(s): A0043481

Permit Number: P0109621

Permit Description: Renewal FEPTIO for one (1) 8-color station flexographic printing press with drying oven. This permit is also an Administrative Modification due to a change in the method of press cleanup where there are no new emissions and no increase in the Synthetic Minor PTE VOC. The Federally Enforceable restrictions also allow the press to avoid MACT Subpart KK requirements as established in PTI 14-05844 was issued final 10/24/06.

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 5/25/2012

Effective Date: 5/25/2012

Expiration Date: 4/7/2016

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Burrows Paper Corporation
2000 Commerce Center Drive
Franklin, OH 45005

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

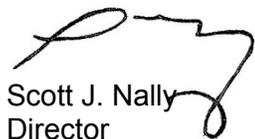
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109621

Permit Description: Renewal FEPTIO for one (1) 8-color station flexographic printing press with drying oven. This permit is also an Administrative Modification due to a change in the method of press cleanup where there are no new emissions and no increase in the Synthetic Minor PTE VOC. The Federally Enforceable restrictions also allow the press to avoid MACT Subpart KK requirements as established in PTI 14-05844 was issued final 10/24/06.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	Flexo Printing Press
Superseded Permit Number:	P0100554
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3. and 4.
2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B001 (21.5 MMBtu/hr Vapor Power natural gas boiler) and K001 (Fischer and Krecke 8-color station flexographic printing press with drying oven) all de minimis emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling 12-month summation.
3. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in any emissions unit listed in B.2. that applies HAP-containing materials in the facility:
 - a) The name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b) The name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per gallon₂ of each HAP-containing material applied;
 - c) The number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d) For each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the materials applied during the month, divided by 2,000 pounds;
 - e) The total combined HAP emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAP emissions from "d" above;
 - f) For each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, for the present month plus the previous 11 months of operation, in ton(s); and

- g) The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, for the present month plus the previous 11 months of operation, in ton(s).

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

² Alternatively, HAP emissions may be calculated as a Weight Fraction of each HAP-containing material applied.

4. The permittee shall submit quarterly deviation (excursion) reports for any emissions unit that applies HAP-containing materials listed in B.2 that identify:

- a) All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- (1) All exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed; and
- (2) All exceedances of the rolling, 12-month total combined HAP emissions limitation for all the coatings, thinners, additives, and cleanup materials employed.

- b) The probable cause of each deviation (excursion);
- c) Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

C. Emissions Unit Terms and Conditions



1. K001, Flexo Printing Press

Operations, Property and/or Equipment Description:

Fischer and Krecke 8-color station flexographic printing press with drying oven

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2) and d)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), c)(2), d)(1)k. through d)(1)m. and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds (VOC) shall not exceed 43.42 pounds per hour from inks and coatings usage. Emissions of VOC shall not exceed 3.0 pounds per day from VOC-containing cleanup materials usage. Emissions of VOC shall not exceed 0.03 pound per hour and 0.13 tons per year (TPY) from the combustion of natural gas in the drying oven. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.011 pound per hour and 0.05 TPY from the combustion of natural gas in the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>drying oven.</p> <p>Emissions of sulfur dioxide (SO₂) shall not exceed 0.0033 pound per hour and 0.01 TPY from the combustion of natural gas in the drying oven.</p> <p>Emissions of nitrogen oxides (NO_x) shall not exceed 0.553 pound per hour and 2.42 TPY from the combustion of natural gas in the drying oven.</p> <p>Emissions of carbon monoxide (CO) shall not exceed 0.465 pound per hour and 2.03 TPY from the combustion of natural gas in the drying oven.</p> <p>See b)(2)d.</p>
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)e.
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Non-Attainment New Source Review, Title V, and MACT requirements	<p>Emissions of VOC shall not exceed 25.00 TPY, based on a rolling, 12-month summation, from inks, coatings, and VOC-containing cleanup materials usage.</p> <p>See Section B.2., b)(2)b., b)(2)c., c)(1), and c)(2).</p>
e.	OAC rule 3745-21-09(Y)(1)(a)(ii)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The maximum VOC content of inks and coatings employed in this emission unit shall not exceed 0.402 pound per gallon of ink or coating, as applied.
- b. The maximum VOC content of inks and coatings employed in this emission unit shall not exceed 0.20 pound per gallon of ink or coating, as applied, based on a monthly volume-weighted average of all inks and coatings employed.
- c. The maximum VOC content of cleanup materials employed in this emission unit shall not exceed 3.00 pounds per gallon of cleanup material, as applied.
- d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as

effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM10, SO2, NOx, and CO emissions from this air contaminant source since the uncontrolled potential to emit for PE/PM10, SO2, NOx, and CO is less than 10 TPY each.

- f. The short-term VOC, PE/PM10, SO2, NOx, and CO emission limitations are based upon the emission unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limitations.

c) **Operational Restrictions**

- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the inks and coatings usage, upon issuance of this permit. The maximum annual inks and coatings usage for this emissions unit shall not exceed 244,500 gallons, as applied, based upon a rolling, 12-month summation of the inks and coatings usage figures.
- (2) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC-containing cleanup materials usage, upon issuance of this permit. The maximum annual VOC-containing cleanup materials usage for this emissions unit shall not exceed 365 gallons based upon a rolling, 12-month summation of the VOC-containing cleanup materials usage figures.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information on a monthly basis for this emission unit:
 - a. The name and identification number of each ink, coating, and VOC-containing cleanup material;
 - b. The usage of each ink and coating, in gallons, as applied;
 - c. The usage of each VOC-containing cleanup material, in gallons;

- d. The VOC content of each ink and coating, in pounds VOC per gallon of ink or coating, as applied;
- e. The VOC content of each VOC-containing cleanup material, in pounds VOC per gallon of VOC-containing cleanup material;
- f. The monthly VOC emissions from inks and coatings usage, in pounds. The monthly VOC emissions from inks and coatings usage shall be calculated by multiplying the usage amount in "b." for each ink and coating employed by the VOC content in "d." for each ink and coating employed during the month; these figures shall then be summed;
- g. The monthly VOC emissions from VOC-containing cleanup materials, in pounds. The monthly VOC emissions from VOC-containing cleanup materials usage shall be calculated by multiplying the usage amount in "c." for each VOC-containing cleanup material by the VOC content in "e." for each VOC-containing cleanup material employed during the month; these figures shall then be summed;
- h. The total usage of all inks and coatings, in gallons, as applied (the summation of the inks and coatings in "b.");
- i. The total usage of all VOC-containing cleanup materials, in gallons (the summation of the VOC-containing cleanup materials in "c.");
- j. The monthly volume-weighted average VOC content for all inks and coatings, in pounds VOC per gallon of inks and coatings, as applied. The monthly volume-weighted average shall be calculated by dividing the monthly VOC emissions, in pounds, from all inks and coatings usage in "f." by the total amount of all inks and coatings employed, in gallons, during the month in "h." yielding the monthly volume weighted average VOC content for the month in pounds VOC per gallon, as applied;
- k. The rolling, 12-month summation of the total inks and coatings usage, in gallons, as applied (the summation of the monthly inks and coatings usage in "h." for the current month plus the 11 preceding calendar months);
- l. The rolling, 12-month summation of the total VOC-containing cleanup materials usage, in gallons (the summation of the monthly VOC-containing cleanup materials in "i." for the current month plus the 11 preceding calendar months); and
- m. The rolling, 12-month VOC emissions from inks, coatings, and cleanup materials usage, in tons (the summation of the monthly VOC emissions from inks and coating usage in "f." for the current month plus the 11 preceding calendar months plus the summation of the monthly VOC emissions from VOC-containing cleanup materials in "g." for the current month plus the 11 preceding calendar months; this figure shall then be divided by 2000 yielding TPY VOC for the current month plus the 11 preceding calendar months).

- (2) The permit to install 14-05844 issued 10/24/06 for emissions unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust systems, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: monoethanolamine (CAS 141-43-5)

TLV ($\mu\text{g}/\text{m}^3$): 7490

Maximum Hourly Emission Rate (lbs/hr): 8.2 lbs monoethanolamine/hr

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 178.1

MAGLC ($\mu\text{g}/\text{m}^3$): 178.3

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (3) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not

previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month inks and coatings usage limitation;
 - ii. all exceedances of the rolling, 12-month VOC-containing cleanup materials usage limitation;
 - iii. all exceedances of the monthly inks and coatings volume-weighted average VOC content limitation;
 - iv. all exceedances of the VOC-containing cleanup materials VOC content limitation; and
 - v. all exceedances of the rolling, 12-month VOC emission limitation from inks, coatings, and VOC-containing cleanup materials usage.
 - b. The probable cause of each deviation (excursion);

- c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. The magnitude and duration of each deviation (excursion)

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

Emissions of volatile organic compounds (VOC) shall not exceed 43.42 pounds per hour from inks and coatings usage.

Emissions of VOC shall not exceed 3.0 pounds per day from VOC-containing cleanup materials usage.

Applicable Compliance Method:

If required, compliance with the short-term Applicable Emission Limitation from inks and coatings usage shall be demonstrated by emission testing employing Method 25 for VOC. An alternative U.S. EPA approved test method may be used with prior approval from the Ohio EPA.

If required, compliance with the short-term Applicable Emission Limitation from VOC-containing cleanup material usage shall be demonstrated by multiplying the actual daily VOC-containing cleanup material usage, in gallons, by the VOC content of the VOC-containing cleanup material, in pounds of VOC per gallon, yielding pounds of VOC per day.

The Applicable Emission Limitations were established based on information provided by the permittee in application A0043481 for FEPTIO P0109621 and the following calculations:

108 gallons inks & coatings, including water/hour x 0.402 pound VOC/gallon inks & coatings, including water = 43.42 pounds VOC/hour, from inks and coatings usage

1 gallon VOC-containing cleanup materials/day x 3.0 pounds VOC/gallon VOC-containing cleanup material = 3.0 pounds VOC/day, cleanup material usage

b. Emission Limitations:

Emissions of VOC shall not exceed 0.03 pound per hour and 0.13 tons per year (TPY) from the combustion of natural gas in the drying oven.

Particulate emissions (PE) and emissions of particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.011 pound per hour and 0.05 TPY from the combustion of natural gas in the drying oven.

Emissions of sulfur dioxide (SO₂) shall not exceed 0.0033 pound per hour and 0.01 TPY from the combustion of natural gas in the drying oven.

Emissions of nitrogen oxides (NO_x) shall not exceed 0.553 pound per hour and 2.42 TPY from the combustion of natural gas in the drying oven.

Emissions of carbon monoxide (CO) shall not exceed 0.465 pound per hour and 2.03 TPY from the combustion of natural gas in the drying oven.

Applicable Compliance Method:

If required, compliance with the short-term Applicable Emission Limitations shall be demonstrated by emission testing employing: Method 25 for VOC, Method 5, for PE/PM10, Method 6 for SO₂, Method 7 for NO_x, and Method 10 for CO. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

If required, compliance with the annual Applicable Emission Limitations shall be demonstrated by multiplying the actual annual fuel usage in the drying oven, in MMcf of natural gas per year, by the emission factors in AP-42, Fifth Ed., Natural Gas Combustion, Tables 1.4-1 and 1.4-2, 7/1998, and dividing by 2000, yielding TPY emissions for each pollutant. Alternatively, emission factors developed from emission testing may be used in place of AP-42 emission factors.

The annual Applicable Emission Limitation were established based on information provided by the permittee in application A0043481 for FEPTIO P0109621 and the following calculations:

$5.64 \text{ MMBtu/hr} \times \text{MMcf natural gas}/1020 \text{ MMBtu} = 5.529\text{E-}3 \text{ MMcf/hour}$

$5.529\text{E-}3 \text{ MMcf/hour} \times 5.5 \text{ pounds VOC/MMcf} \times 8760 \text{ hours/year} \times 1 \text{ Ton}/2000 \text{ pounds} = 0.13 \text{ TPY VOC}$

$5.529\text{E-}3 \text{ MMcf/hour} \times 1.9 \text{ pounds PE/PM10/MMcf} \times 8760 \text{ hours/year} \times 1 \text{ Ton}/2000 \text{ pounds} = 0.05 \text{ TPY PE/PM10}$

$5.529\text{E-}3 \text{ MMcf/hour} \times 0.6 \text{ pounds SO}_2/\text{MMcf} \times 8760 \text{ hours/year} \times 1 \text{ Ton}/2000 \text{ pounds} = 0.01 \text{ TPY SO}_2$

$5.529\text{E-}3 \text{ MMcf/hour} \times 100 \text{ pounds NO}_x/\text{MMcf} \times 8760 \text{ hours/year} \times 1 \text{ Ton}/2000 \text{ pounds} = 2.42 \text{ TPY NO}_x$

$5.529\text{E-}3 \text{ MMcf/hour} \times 84 \text{ pounds CO}/\text{MMcf} \times 8760 \text{ hours/year} \times 1 \text{ Ton}/2000 \text{ pounds} = 2.03 \text{ TPY CO}$

The short-term Applicable Emission Limitations were similarly established by multiplying the fuel use in MMcf natural gas per hour by the AP-42 emission factors in pounds of pollutant per MMcf natural gas.

c. Emission Limitation:

Emissions of VOC shall not exceed 25.00 TPY, based on a rolling, 12-month summation, from inks, coatings, and VOC-containing cleanup materials usage.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emission limitation shall be demonstrated by the recordkeeping requirement in d)(1)m.

The Applicable Emission Limitation was established based on information provided by the permittee in application A0043481 for FEPTIO P0109621 and the following calculations:

$244,500 \text{ gallons inks \& coatings, including water/year} \times 0.200 \text{ pound VOC/gallons inks \& coatings, including water} \times 1 \text{ Ton}/2000 \text{ pounds} = 24.45 \text{ TPY VOC, from the application of inks \& coatings}$

$365 \text{ gal cleanup/year} \times 3.0 \text{ pounds VOC/gallon cleanup material} \times 1 \text{ Ton}/2000 \text{ pounds} = 0.55 \text{ TPY VOC, from VOC-containing cleanup material usage}$

$24.45 \text{ TPY} + 0.55 \text{ TPY} = 25.00 \text{ TPY VOC}$

g) Miscellaneous Requirements

(1) None.