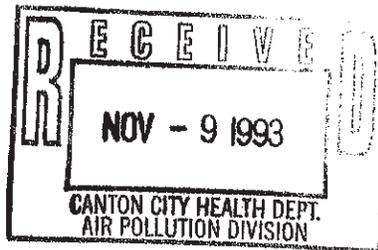




State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329



George V. Voinovich
Governor
Donald R. Schregardus
Director

Re: Permit to Install
Stark County
Application No: 15-1064

CERTIFIED MAIL

November 3, 1993

BUCKEYE PACKAGING COMPANY, INC
JOHN F DAVIS, PRESIDENT
P O BOX 996
HARTVILLE, OH 44632

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review 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 with the Environmental Board of Review within thirty (30) days after notice of the Director's 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 Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA
CANTON AIR POLLUTION CONTROL



Permit to Install Terms and Conditions

Application No. 15-1064
APS Premise No. 1576011509
Permit Fee: \$200.00

Name of Facility: BUCKEYE PACKAGING COMPANY, INC

Person to Contact: JOHN F DAVIS, PRESIDENT

Address: P O BOX 996
HARTVILLE, OH 44632

Location of proposed source(s): 12223 MARLBORO AVE NE
MARLBORO TWP, OHIO

Description of proposed source(s):
FLEXOGRAPHIC PRINTING PRESS.

Date of Issuance: November 3, 1993

Effective Date: November 3, 1993

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES(S)

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

If the construction of the proposed source(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 Ohio Administrative Code (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.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION 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.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for BUCKEYE PACKAGING COMPANY, INC located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K006	1 - 4 Color Flexographic Printing Press, Buckeye Press #6	Use of Water Based Inks and See Additional Special Terms and Conditions	3745-31-05 3745-21-09(Y)	2.1 lbs OC/hr* 0.77 ton OC/month* 9.2 tons OC/year*

*The OC allowable includes any OC emitted by this source including but not limited to solvents used to make the flexographic press ready for printing and solvents used for press, parts and worker cleanup.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	9.2

CONSTRUCTION STATUS

The Canton Air Pollution Control shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: K006, 1-4 Color Flexographic Printing Press, Buckeye Press #6.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Canton Air Pollution Control, 218 Cleveland Ave. SW, 3rd Floor, City Hall, Canton, Ohio 44702.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has 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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Solvent based ink usage shall not exceed 25% of overall ink usage on a monthly basis on this source. Compliance with this term shall be determined by calculating the gallons (prior to the addition of any solvents) of solvent based ink used per month as a percentage of the sum of the gallons of the solvent based inks (prior to the addition of any solvents) and the gallons of water based ink (prior to the addition of any solvents) per month.
2. This facility shall submit semi-annual reports to the Canton City Health Department, Air Pollution control division, 420 Market Avenue North, Canton, Ohio 44702, phone (216) 489-3385, which shows monthly records of the following.

Information for each ink employed in this source during the previous six calendar months: identification of the ink; the total number of gallons of ink employed; the VOC content, in gallons of VOC per gallon of ink; the density of the VOC in the ink in pounds of VOC per gallons of VOC; the water content in gallons of water per gallon of ink; and the nonvolatile (solids) content in pounds of solid per gallon of ink. This information should be based on the ink as employed, in other words after any solvents (including solvents used to maintain ink running viscosity on the press but not cleanup solvents), thinners, viscosity reducers, etc. have been added. Also, report the amount and type of solvents used to maintain ink running viscosity on the press. Also report the amount and type of cleanup solvents employed.

The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

3. The volatile organic compound content of the water base inks as employed in this source shall not exceed 25% VOC by volume of the volatile matter in the ink.
4. This source may emit up to 2.1 lbs OC/hr, 0.77 ton OC/month, and 9.2 tons OC/year. This allowable includes any solvent used to make the flexographic press ready or for press, parts and worker cleanup.