



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Stark County
Application No: 15-1234
TOXIC REVIEW
SYNTHETIC MINOR

CERTIFIED MAIL

July 3, 1996

JUL 5 1996

BUCKEYE PACKAGING CO
JOHN DAVIS
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.

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental 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

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 15-1234
APS Premise No. 1576011509
Permit Fee: \$400.00

Name of Facility: BUCKEYE PACKAGING CO

Person to Contact: JOHN DAVIS

Address: P.O. BOX 996
HARTVILLE, OH 44632

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

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

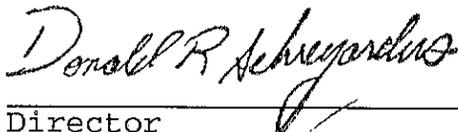
Date of Issuance: July 3, 1996

Effective Date: July 3, 1996

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

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)

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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 30 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 filed no later than thirty days after commencement of operation.

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 CO 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>
K007	6 color flexo-graphic printing press, Buckeye Press #7.	Use of water based inks and see Additional Special Terms and Conditions	3745-31-05 3745-21-09 (Y)	2.1 lbs VOC/hr* 0.77 ton VOC/month* 9.2 tons VOC/year*

*The VOC allowable includes any VOC 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 clean-up.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

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

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.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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 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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Control Measures and/or Usage Requirements:

1. Solvent based ink usage shall not exceed 25% of overall ink usage on a monthly basis on this emissions unit. 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. The volatile organic compound content of the water base inks as employed in this emissions unit shall not exceed 25% VOC by volume of the volatile matter in the ink.
3. This emissions unit may emit up to 2.1 lbs VOC/hr, 0.77 ton VOC/month, and 9.2 tons VOC/year. This allowable includes any solvent used to make the flexographic press ready or for press, parts and worker cleanup.
4. This emissions unit shall not emit any Hazardous Air Pollutants (HAPs) as defined in the 1990 CAA.

B. Monitoring and/or Record-Keeping Requirements:

This permittee shall maintain monthly records which list the following information for each surface coating, ink, makeup solvent or cleanup solvent employed in this emissions unit:

1. the company identification of the ink;
2. the number of gallons employed;
3. the VOC content, in pounds of VOC per gallon of ink;

4. the VOC content, in pounds of VOC per gallon of ink; minus water;
5. the water content, in percent by volume;
6. the nonvolatile (solids) content, in percent by volume; and
7. calculations showing that term and conditions (A)(1), (A)(2) and A(3) are not being violated.

In addition, this permittee shall maintain monthly records which list the following information for any solvents used to maintain viscosity or solvents used for clean-up:

1. the company identification of the solvent;
2. the number of gallons employed; and
3. the density of the solvent.

Also this permittee shall maintain monthly records of the percent of solvent based inks used as opposed to the total amount of inks used by this emissions unit.

These monthly records, as well as any supporting ink analyses and computations, shall be retained in the permittee's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review.

C. **Reporting Requirements:**

The permittee shall notify the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue N., Canton, Ohio 44702 of any monthly record which shows a violation of any limit found in this permit. This notification shall be sent within 45 days after the exceedence occurs.

D. **Testing Requirements:**

U.S. EPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the owner or operator shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Methods 24 or 24A.