



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
HARDIN COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-13684**

**DATE:** 11/29/2001

International Paper Food Service  
Dan Brown  
1300 South Main Street  
Kenton, OH 43326

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

NWDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 11/29/2001  
Effective Date: 11/29/2001**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13684

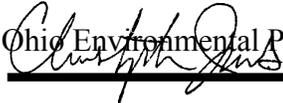
Application Number: 03-13684  
APS Premise Number: 0333010035  
Permit Fee: **\$200**  
Name of Facility: International Paper Food Service  
Person to Contact: Dan Brown  
Address: 1300 South Main Street  
Kenton, OH 43326

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1300 South Main Street  
Kenton, Ohio**

Description of proposed emissions unit(s):  
**Flexographic Printing Press with Drying Oven (Administrative modification to correct typographical errors and to revise record keeping requirements).**

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

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**Facility ID: 0333010035**

## **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 Record keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate 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**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

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modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	24.27

**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>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Flexographic Printing Press with Electric Drying Oven	OAC rule 3745-31-05 (A)(3)	Printing Operation: 4.72 lbs of VOC/hour; 20.67 tons of VOC/year
	OAC rule 3745-21-09 (Y)(1)(a)	Cleanup Materials: 0.30 ton of VOC/month; 3.60 tons of VOC/year  See A.2.a.

**2. Additional Terms and Conditions**

- 2.a The permittee shall comply with one of the following VOC limitations:
  - i. The VOC content of each coating and ink shall not exceed 40 percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or
  - ii. The VOC content of each coating and ink shall not exceed 25 percent VOC by volume of the volatile matter in the coating and ink, as applied.

**B. Operational Restrictions**

None

**C. Monitoring and/or Record keeping Requirements**

1. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system,

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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isopropyl Alcohol

TLV (mg/m<sup>3</sup>): 983

Maximum Hourly Emission Rate (lbs/hr): 4.72

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 299.40

MAGLC (ug/m<sup>3</sup>): 23404.76

2. 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 (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 previously modeled;
  - 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

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Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

4. 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 its 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.
  
5. The permittee shall collect and record the following information each month for the printing operation:
  - a. The name and identification number of each coating and ink, as applied.
  - b. The VOC content of each coating and ink, as applied\*, in lbs/gal.
  - c. When complying with the VOC emission limitation specified in section A.2.a.i., the permittee shall collect and record the following: the VOC content of each coating and ink in percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied\* [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{VOC,5}$ ].  
  
When complying with the VOC emission limitation specified in section A.2.a.ii., the permittee shall collect and record the following: 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  $C_{VOC,6}$  if complying with the VOC limitation in section A.2.a.ii.].
  - d. The number of gallons of each coating and ink employed.

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- e. The VOC emission rate for each coating and ink employed (b x d), in lbs/mth.
- f. The total VOC emission rate for all coatings and inks employed (sum of e), in lbs/mth.
- g. The annual, year to date VOC emissions from all coatings and inks employed (sum of f), in tons, for each calendar month to date from January to December.

\* When the permittee employs a blend or mixture of compliant coatings/inks (i.e., each individual coating/ink complies with the appropriate VOC emission limitation in section A.2.a.i. or A.2.a.ii.) and the mixture does not involve the addition of any "thinning agents," the permittee may apply the record keeping requirements of this term and condition to the individual components of the mixture in lieu of the blend or mixture on an "as applied" basis.

**6.** The permittee shall collect and record the following information each month:

- a. The name and identification number of each cleanup material employed.
- b. The VOC content of each cleanup material, as applied, in lbs/gal.
- c. The number of gallons of each cleanup material employed.
- d. The VOC emission rate for each cleanup material employed (b x c), in lbs/mth.
- e. The total VOC emission rate for all cleanup materials employed (sum of d), in lbs/mth.
- f. The annual, year to date VOC emissions from all cleanup materials employed (sum of e), in tons, for each calendar month to date from January to December.

#### **D. Reporting Requirements**

- 1.** The permittee shall notify the Northwest District Office 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 Northwest District Office within 30 days following the end of the calendar month.
- 2.** The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation of 20.67 tons of VOC per year for printing operations and any deviations from the annual emission limitation of 3.60 tons of VOC per year for cleanup materials. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. The report shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### **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  
4.72 lbs of VOC/hour

Applicable Compliance Method

The hourly limitation represents the potential to emit\* of the emissions unit. Therefore, no monitoring and record keeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\* The potential to emit for this emissions unit is based on the summation of emissions from the following components of the flexographic printing process:

- i. Ink - 4.00 pounds of VOC per hour (based on a maximum ink usage rate of 40 lbs/hour and a maximum VOC content 0.10 lb of VOC/lb of ink)
- ii. Coating - 0.36 pound of VOC per hour (based on a maximum coating usage of 12 lbs/hour and a maximum VOC content of 0.03 lb of VOC/lb of coating)
- iii. Additives - 0.36 pound of VOC per hour (based on a maximum additive usage rate of 8.70 pounds per hour and a maximum weighted average of 0.42 percent VOC)

- b. Emission Limitation  
20.67 tons of VOC/year

Applicable Compliance Method

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements in section C.5.

- c. Emission Limitation  
VOC content of each coating and ink not to exceed 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section C.5. Formulation data, U.S. EPA Method 24, or U.S. EPA Method 24A shall be used to determine the VOC contents of the coatings.

- d. 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 based upon the record keeping requirements specified in section C.5. Formulation data, U.S. EPA Method 24, or U.S. EPA Method 24A shall be used to determine the VOC contents of the coatings.

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Emissions Unit ID: **K005**

- e. Emission Limitation  
0.30 ton of VOC/month - cleanup materials

Applicable Compliance Method

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements in section C.6.

- f. Emission Limitation  
3.60 tons of VOC/year - cleanup materials

Applicable Compliance Method

Compliance with the above emission limitation shall be demonstrated by the monitoring and record keeping requirements in section C.6.

**F. Miscellaneous Requirements**

None