



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL CERTIFIED MAIL
SANDUSKY COUNTY**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-13408

DATE: 4/26/00

Green Bay Packaging Inc
Bill Hasselbach
PO BOX 650
Fremont, OH 434200650

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 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



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 4/26/00

FINAL PERMIT TO INSTALL 03-13408

Application Number: 03-13408
APS Premise Number: 0372030198
Permit Fee: **\$200**
Name of Facility: Green Bay Packaging Inc
Person to Contact: Bill Hasselbach
Address: PO BOX 650
Fremont, OH 434200650

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2323 Commerce Drive
Fremont, Ohio**

Description of proposed emissions unit(s):

Installation of a flexographic printing press station with gluing and folding capability.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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

Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

Green Bay Packaging Inc
PTI Application: 03-13408
Issued: 4/26/00

Facility ID: 0372030198

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> |
|------------------|----------------------|
| OC | 35.70 |

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> |
|--|--------------------------------------|---|
| K004 - Flexographic Press/ Folder/ Gluer with Inline Die Cutter - Martin (37" x 97") | OAC rule 3745-31-05 | From Coating/Ink Usage: 10.52 pounds OC per hour 34.56 TPY OC |
| | OAC rule 3745-21-09(Y)(1)(a) | See B.1. |
| | OAC rule 3745-31-05 | From Glue Usage: 0.32 pounds OC per hour 1.05 TPY OC |
| | OAC rule 3745-21-07(G) | See B.2. |
| | OAC rule 3745-31-05 | From Cleanup: 15 pounds OC per month 0.09 TPY OC |
| | OAC rule 3745-21-07(G) | See B.2. |

2. Additional Terms and Conditions

- 2.a None

B. Operational Restrictions

1. The volatile organic compound (VOC) content of any coating and/or ink employed flexographically in this emissions unit shall not exceed the following limitation:
 - a. forty percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied; or
 - b. twenty-five percent VOC by volume of the volatile matter in the coating and ink, as

applied.

2. The organic emissions from the gluing and associated cleanup operations are subject to OAC rule 3745-21-07(G). However, there is no organic compound emission limit established by the rule due to the following operational restriction: the use of photochemically reactive materials for gluing and associated cleanup operations, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. For flexographic coatings/inks:
 - i. the name and identification of each coating/ink employed;
 - ii. the VOC content of each coating/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 $C_{VOC,5}$];
 - iii. the VOC content of each coating/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 $C_{VOC,5}$];
 - iv. the amount, in pounds, of each coating/ink employed;
 - v. the OC content in weight percent for each coating/ink, as applied;
 - vi. OC emissions from each coating/ink employed (iv. x v.), in pounds; and
 - vii. total OC emissions from all coatings/inks employed (summation of vi.), in pounds; and
 - viii. the annual, year to date OC emissions from all coatings/inks employed, in tons (summation of vii.) for each calendar month to date from January to December;
 - b. For materials employed in the associated gluing operation:
 - i. the name and identification number of each adhesive employed;

- ii. determination of whether the material is photochemically reactive;
 - iv. the amount, in pounds, of each coating/ink employed;
 - v. the OC content in weight percent for each coating/ink, as applied;
 - vi. OC emissions from each coating/ink employed (iv. x v.), in pounds; and
 - vii. total OC emissions from all coatings/inks employed (summation of vi.), in pounds; and
 - viii. the annual, year to date OC emissions from all coatings/inks employed, in tons (summation of vii.) for each calendar month to date from January to December;
- c. For cleanup materials:
- i. the name and identification number of each cleanup material, employed;
 - ii. for cleanup materials associated with the gluing operation, determination of whether the material is photochemically reactive;
 - iv. the amount, in pounds, of each coating/ink employed;
 - v. the OC content in weight percent for each coating/ink, as applied;
 - vi. OC emissions from each coating/ink employed (iv. x v.), in pounds; and
 - vii. total OC emissions from all coatings/inks employed (summation of vi.), in pounds; and
 - viii. the annual, year to date OC emissions from all coatings/inks employed, in tons (summation of vii.) for each calendar month to date from January to December.
2. The permit to install for this emissions unit (K004) 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

Emissions Unit ID: **K004**

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: Ammonia
TLV (ug/m3): 17,000
Maximum Hourly Emission Rate (lbs/hr): 3.7
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 272.6
MAGLC (ug/m3): 404.8

Pollutant: Monoethanolamine
TLV (ug/m3): 7500
Maximum Hourly Emission Rate (lbs/hr): 1.59
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 117.2
MAGLC (ug/m3): 178.6

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.).

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(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.

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.
3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notifications shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed in the gluing or cleanup operations.
3. The permittee shall submit annual deviation (excursion) reports which identify any and all exceedances of the annual emission limitations contained in Section A. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

Green Bay Packaging Inc
PTI Application: 03-13409
Issued

Facility ID: 0372030198

Emissions Unit ID: **K004**

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

- a. Emission Limitation
10.53 lb/hr OC (coatings/inks)

Applicable Compliance Method

The hourly OC limits are based on the emissions unit's potential to emit i.e., the maximum usage rate of 223.9 pounds of coating/ink per hour at a maximum OC content of 4.7% by weight. Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

- b. Emission Limitation
34.56 TPY OC (coatings/inks)
- Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and recordkeeping requirements contained in Section C.1.a.
- c. Emission Limitation
0.32 lb/hr OC (adhesives)
- Applicable Compliance Method
The hourly OC limits are based on the emissions unit's potential to emit i.e., the maximum usage rate of 21.4 pounds of adhesive per hour at a maximum OC content of 1.5% by weight. Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.
- d. Emission Limitation
1.05 TPY OC (adhesives)
- Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and recordkeeping requirements contained in Section C.1.b.
- e. Emission Limitation
15.0 lb/month OC (cleanup)
- Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and recordkeeping requirements contained in Section C.1.c.
- f. Emission Limitation
0.09 TPY OC (cleanup)
- Applicable Compliance Method
Compliance shall be demonstrated by the monitoring and recordkeeping requirements contained in Section C.1.c.
- g. Emission Limitation
40% VOC by volume of coating and ink, excluding water and exempt solvents, OR 25%

14

Green

PTI A

Issued: 4/26/00

Emissions Unit ID: **K004**

VOC by volume of the volatile matter in the coating/ink.

15

Green

PTI A

Issued: 4/26/00

Emissions Unit ID: **K004**

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements as specified in C.1. Formulation data or USEPA Method 24A shall be used to determine the VOC contents of the coatings.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 03-13408 Facility ID: 0372030198

FACILITY NAME Green Bay Packaging Inc

FACILITY DESCRIPTION Installation of a flexographic printing press station with gluing and folding capability CITY/TWP Fremont

SIC CODE 2653 SCC CODE 3-07-013-99 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Flexographic Press/Folder/Gluer with Inline Die Cutter - Martin (37" x 97")

DATE INSTALLED Upon issuance of permit

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|--|-----------------------|--|-----------------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Attainment | 10.84 lb/hr (ink & glue) 15 lb/mo (cleanup) | 35.70 (all materials) | 10.84 lb/hr (ink & glue) 15 lb/mo (cleanup) | 35.70 (all materials) |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Use of RACT compliant coatings, use of non-photochemically reactive materials, and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? XX YES NO

IDENTIFY THE AIR CONTAMINANTS: Ammonia, Monoethanolamine