

Synthetic Minor Determination and/or Netting Determination

Permit To Install **06-07273**

A. Source Description

The new source is a central impression flexographic printing press. In order to establish a facility-wide emission limit, the permits for the three existing flexographic printing presses (K001, K002, K004) are also being modified. K003 has been removed.

B. Facility Emissions and Attainment Status

The facility is located in Tuscarawas County which is currently designated attainment for all pollutants. Facility emissions currently are permitted at 92.7 TPY.

C. Source Emissions

Potential emissions are difficult to quantify since there is no reason to apply ink at the theoretical maximum of 100% substrate coverage with every color so actual maximums were used. The allowable rates for existing emissions units are: K001 = 3.1 TPY (water based coatings only); K002 = 46.4 TPY; K003 has been removed; and K004 = 46.4 TPY. The new emission unit K005 will also be limited to 46.4 TPY. They also have requested a 99 TPY facility-wide cap to avoid Title V.

D. Conclusion

The operational restrictions, emission limits, record keeping and reporting requirements of this permit are sufficient to provide federally enforceable limitations to limit the potential to emit from this press. With issuance of this permit, the federally enforceable potential to emit from K001, K002, K004 and K005, combined, will be 99.0 tons VOC.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
TUSCARAWAS COUNTY
Application No: 06-07273**

CERTIFIED MAIL

DATE: 8/12/2003

Primary Packaging Inc
Andy Mark
10810 Industrial Parkway NW
Bolivar, OH 44612

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$500** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

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TUSCARAWAS COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07273 FOR AN AIR CONTAMINANT SOURCE FOR
PRIMARY PACKAGING INC**

On 8/12/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Primary Packaging Inc**, located at **10810 Industrial Parkway NW, Bolivar, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07273:

Six color central impression flexographic press.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Kay Gilmer, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 06-07273

Application Number: 06-07273
APS Premise Number: 0679000276
Permit Fee: **To be entered upon final issuance**
Name of Facility: Primary Packaging Inc
Person to Contact: Andy Mark
Address: 10810 Industrial Parkway NW
Bolivar, OH 44612

Location of proposed air contaminant source(s) [emissions unit(s)]:
**10810 Industrial Parkway NW
Bolivar, Ohio**

Description of proposed emissions unit(s):
Six color central impression flexographic press.

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

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

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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

Primary Packaging Inc
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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 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

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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 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 ninety (90) 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	99.0

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>
K001 - Wolverine six-color flexographic printing press <i>Administrative modification</i>	OAC rule 3745-31-05(A)(3)	Emissions of VOC shall not exceed 0.7 pounds per hour or 3.1 tons per year.
Terms and conditions in this permit supersede those identified in PTI # 06-4723 issued 1/10/96.	OAC rule 3745-35-07(B)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21- 09(Y)(1)(a).
	OAC rule 3745-21-09(Y)(1)(a)	Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility, which is comprised of K001, K002, K004 and K005.
		The VOC content of coatings and inks used shall not exceed either: 40% VOC by volume of the coating and ink, excluding water, or 25% VOC by volume of the volatile matter in the coating and ink.

2. Additional Terms and Conditions

- 2.a The hourly and annual OC emission limitations for this emissions unit in section A.1 were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore,

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Emissions Unit ID: **K001**

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no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

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B. Operational Restrictions

1. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of ink employed x solvent content of ink, in percent OC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

The permittee has sufficient monthly records of solvent usage and OC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the facility:
 - a. The name and identification number of each coating and ink, as applied.
 - b. The OC content of each coating and ink, in percent by weight, excluding water and exempt solvents, as applied.
 - c. The number of pounds (excluding water and exempt solvents) of each coating and ink employed.
 - d. The name and identification of each cleanup material employed.
 - e. The number of pounds of each cleanup material employed, excluding water.
 - f. The total OC emissions from all coatings, inks, and cleanup materials employed, in tons.
 - g. The year-to-date total usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility, in tons.

(This information does not have to be kept on a line-by-line basis. "As applied" refers to the base coating plus all additives.)

2. The permittee shall collect and record the following information for each coating used in this

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emissions unit:

Emissions Unit ID: **K001**

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PTI A

Emissions Unit ID: **K001**

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- a. The name and identification number of each coating, as applied.
- b. The percent VOC by volume of the coating or ink, excluding water and exempt solvents;
or
- c. The percent VOC by volume of the volatile matter in the coating or ink.

D. Reporting Requirements

1. The permittee shall notify the Southeast District Office in writing of any record showing that the volatile organic compound content of the coatings and inks employed in this line exceeded: 40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

E. Testing Requirements

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

- a. Emission Limitation:

Emissions of VOC shall not exceed 0.7 pounds per hour.

Applicable Compliance Method:

Compliance shall be based on the following calculation, which represents the maximum rated capacity of the coating equipment using the maximum OC content coating as shown in the permit application: $(1.3 \text{ gal/hr})(0.5 \text{ lb/gal}) = 0.65 \text{ lb/hr}$.

- b. Emission Limitation:

Emissions of VOC shall not exceed 3.1 tons per year.

Applicable Compliance Method:

The TPY emission limitation was developed by multiplying the hourly allowable emission limitation (0.7 lb/hr) by the maximum annual hours of operation (8,760 hours), and then

Emissions Unit ID: **K001**

dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and the reporting specified in section D.1 of this permit.

d. Emission Limitation:

Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

Applicable Compliance Method:

Compliance shall be calculated based upon the record keeping specified in Section C.1 of this permit using the equation in Section B.1.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

F. Miscellaneous Requirements

None.

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Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

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>
K002 - Faustel five-stage flexographic printing press Administrative modification Terms and conditions in this permit supersede those identified in PTI # 06-4767 issued 4/17/96.	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 10.6 pounds per hour nor 46.4 tons per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-09(Y)(2)(b) and 3745-21-09(Y)(1)(a).
	OAC rule 3745-35-07(B)	Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility, which is comprised of K001, K002, K004 and K005.
	OAC rule 3745-21-09(Y)(2)(b)	Usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility shall not exceed 148 tons per year.
	OAC rule 3745-21-09(Y)(1)(a)	See section A.2.a.

2. Additional Terms and Conditions

Primary Packaging Inc
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Facility ID: 0679000276

Emissions Unit ID: **K002**

- 2.a** If the permittee ever employs more than 148 tons of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility in any

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Emissions Unit ID: **K002**

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year, thereafter, the volatile organic compound content of the coatings and inks employed in this line shall not exceed: 40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink.

- 2.b** The hourly and annual OC emission limitations for this emissions unit in section A.1 were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

B. Operational Restrictions

1. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of ink employed x solvent content of ink, in percent OC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

The permittee has sufficient monthly records of solvent usage and OC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the facility:
- The name and identification number of each coating and ink, as applied.
 - The OC content of each coating and ink, in percent by weight, excluding water and exempt solvents, as applied.
 - The number of pounds (excluding water and exempt solvents) of each coating and ink employed.
 - The name and identification of each cleanup material employed.
 - The number of pounds of each cleanup material employed, excluding water.
 - The total OC emissions from all coatings, inks, and cleanup materials employed, in tons.

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Emissions Unit ID: **K002**

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- g. The year-to-date total usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility, in tons.

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Emissions Unit ID: **K002**

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(This information does not have to be kept on a line-by-line basis. "As applied" refers to the base coating plus all additives.)

2. NOTE: The record keeping requirements contained in this part shall only apply if the 148 tons of coatings/inks per year limitation has been exceeded.

The permittee shall collect and record the following information for each coating used in this emissions unit:

- a. The name and identification number of each coating, as applied.
- b. The percent VOC by volume of the coating or ink, excluding water and exempt solvents;
or
- c. The percent VOC by volume of the volatile matter in the coating or ink.

D. Reporting Requirements

1. The permittee shall notify the Southeast District Office in writing of any annual record showing that the facility employs more than 148 tons of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

If any record shows that this emissions unit employs more than 148 tons of coatings and inks in any year, thereafter, the reporting requirements contained in Section D.2 of this permit shall apply and the record keeping in Section C.1.g and reporting in the preceding paragraph will no longer be applicable.

2. NOTE: The reporting requirements contained in this part shall only apply if the 148 tons of coating limitation has been exceeded.

The permittee shall notify the Southeast District Office in writing of any record showing that the volatile organic compound content of the coatings and inks employed in this line exceeded: 40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

Primary Packaging Inc
PTI A
Issued

Facility ID: 0679000276

Emissions Unit ID: **K002**

3. The permittee shall submit annual reports which include the total usage of coatings and inks in all flexographic packaging rotogravure printing lines at this facility during the calendar year, in tons as well as the annual OC emissions from this emissions unit. This report shall be submitted by January 31 of each year.

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Emissions Unit ID: **K002**

E. Testing Requirements

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

- a. Emission Limitation:

10.6 pounds of organic compounds per hour

Applicable Compliance Method:

Compliance shall be based on the following calculation, which represents the maximum rated capacity of the coating equipment using the maximum OC content coating as shown in the permit application: $(2.03 \text{ gal/hr})(5.18 \text{ lb/gal}) = 10.52 \text{ lb/hr}$.

- b. Emission Limitation:

46.4 tons of organic compounds per year

Applicable Compliance Method:

The TPY emission limitation was developed by multiplying the hourly allowable emission limitation (10.6 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term limitation, compliance shall also be shown with the annual emission limitation.

- c. Emission Limitation:

148 tons of coating in any year

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1 and the reporting specified in section D.1 of this permit.

- d. Emission Limitation:

40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink.

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Emissions Unit ID: **K002**

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and the reporting specified in section D.2 of this permit.

e. Emission Limitation:

Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

Applicable Compliance Method:

Compliance shall be calculated based upon the record keeping specified in Section C.1 of this permit using the equation in Section B.1.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

F. Miscellaneous Requirements

None.

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Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

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 - Six-color flexographic press with two station outboard unit Administrative modification Terms and conditions in this permit supersede those identified in PTI # 06-07077 issued 1/14/03.	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 10.6 pounds per hour nor 46.4 tons per year.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-09(Y)(2)(b) and 3745-21-09(Y)(1)(a).
	OAC rule 3745-35-07(B)	Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility, which is comprised of K001, K002, K004 and K005.
	OAC rule 3745-21-09(Y)(2)(b)	Usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility shall not exceed 148 tons per year.
	OAC rule 3745-21-09(Y)(1)(a)	See section A.2.a.

2. Additional Terms and Conditions

Primary Packaging Inc
PTI A
Issued

Facility ID: 0679000276

Emissions Unit ID: **K004**

- 2.a** If the permittee ever employs more than 148 tons of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility in any

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PTI A

Emissions Unit ID: **K004**

Issued: To be entered upon final issuance

year, thereafter, the volatile organic compound content of the coatings and inks employed in this line shall not exceed: 40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink.

- 2.b** The hourly and annual OC emission limitations for this emissions unit in section A.1 were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

B. Operational Restrictions

1. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of ink employed x solvent content of ink, in percent OC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

The permittee has sufficient monthly records of solvent usage and OC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the facility:
- The name and identification number of each coating and ink, as applied.
 - The OC content of each coating and ink, in percent by weight, excluding water and exempt solvents, as applied.
 - The number of pounds (excluding water and exempt solvents) of each coating and ink employed.
 - The name and identification of each cleanup material employed.
 - The number of pounds of each cleanup material employed, excluding water.
 - The total OC emissions from all coatings, inks, and cleanup materials employed, in tons.

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- g. The year-to-date total usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility, in tons.

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(This information does not have to be kept on a line-by-line basis. "As applied" refers to the base coating plus all additives.)

2. NOTE: The record keeping requirements contained in this part shall only apply if the 148 tons of coatings/inks per year limitation has been exceeded.

The permittee shall collect and record the following information for each coating used in this emissions unit:

- a. The name and identification number of each coating, as applied.
- b. The percent VOC by volume of the coating or ink, excluding water and exempt solvents;
or
- c. The percent VOC by volume of the volatile matter in the coating or ink.

D. Reporting Requirements

1. The permittee shall notify the Southeast District Office in writing of any annual record showing that the facility employs more than 148 tons of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

If any record shows that this emissions unit employs more than 148 tons of coatings and inks in any year, thereafter, the reporting requirements contained in Section D.2 of this permit shall apply and the record keeping in Section C.1.g and reporting in the preceding paragraph will no longer be applicable.

2. NOTE: The reporting requirements contained in this part shall only apply if the 148 tons of coating limitation has been exceeded.

The permittee shall notify the Southeast District Office in writing of any record showing that the volatile organic compound content of the coatings and inks employed in this line exceeded: 40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

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3. The permittee shall submit annual reports which include the total usage of coatings and inks in all flexographic packaging rotogravure printing lines at this facility during the calendar year, in tons as well as the annual OC emissions from this emissions unit. This report shall be submitted by January 31 of each year.

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E. Testing Requirements

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

a. Emission Limitation:

10.6 pounds of organic compounds per hour

Applicable Compliance Method:

Compliance shall be based on the following calculation, which represents the maximum rated capacity of the coating equipment using the maximum OC content coating as shown in the permit application: $(2.03 \text{ gal/hr})(5.18 \text{ lb/gal}) = 10.52 \text{ lb/hr}$.

b. Emission Limitation:

46.4 tons of organic compounds per year

Applicable Compliance Method:

The TPY emission limitation was developed by multiplying the hourly allowable emission limitation (10.6 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

148 tons of coating in any year

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1 and the reporting specified in section D.1 of this permit.

d. Emission Limitation:

40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink.

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Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and the reporting specified in section D.2 of this permit.

e. Emission Limitation:

Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

Applicable Compliance Method:

Compliance shall be calculated based upon the record keeping specified in Section C.1 of this permit using the equation in Section B.1.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

F. Miscellaneous Requirements

None.

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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 - Six-color central impression flexographic press	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 10.6 pounds per hour nor 46.4 tons per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-09(Y)(2)(b) and 3745-21-09(Y)(1)(a).
	OAC rule 3745-35-07(B)	Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility, which is comprised of K001, K002, K004 and K005.
	OAC rule 3745-21-09(Y)(2)(b)	Usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility shall not exceed 148 tons per year.
	OAC rule 3745-21-09(Y)(1)(a)	See section A.2.a.

2. Additional Terms and Conditions

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- 2.a** If the permittee ever employs more than 148 tons of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility in any

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year, thereafter, the volatile organic compound content of the coatings and inks employed in this line shall not exceed: 40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink.

- 2.b** The hourly and annual OC emission limitations for this emissions unit in section A.1 were established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to demonstrate compliance with these limitations.

B. Operational Restrictions

1. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of ink employed x solvent content of ink, in percent OC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

The permittee has sufficient monthly records of solvent usage and OC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the facility:
 - a. The name and identification number of each coating and ink, as applied.
 - b. The OC content of each coating and ink, in percent by weight, excluding water and exempt solvents, as applied.
 - c. The number of pounds (excluding water and exempt solvents) of each coating and ink employed.
 - d. The name and identification of each cleanup material employed.
 - e. The number of pounds of each cleanup material employed, excluding water.
 - f. The total OC emissions from all coatings, inks, and cleanup materials employed, in tons.

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- g. The year-to-date total usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility, in tons.

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(This information does not have to be kept on a line-by-line basis. "As applied" refers to the base coating plus all additives.)

2. NOTE: The record keeping requirements contained in this part shall only apply if the 148 tons of coatings/inks per year limitation has been exceeded.

The permittee shall collect and record the following information for each coating used in this emissions unit:

- a. The name and identification number of each coating, as applied.
- b. The percent VOC by volume of the coating or ink, excluding water and exempt solvents;
or
- c. The percent VOC by volume of the volatile matter in the coating or ink.

D. Reporting Requirements

1. The permittee shall notify the Southeast District Office in writing of any annual record showing that the facility employs more than 148 tons of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

If any record shows that this emissions unit employs more than 148 tons of coatings and inks in any year, thereafter, the reporting requirements contained in Section D.2 of this permit shall apply and the record keeping in Section C.1.g and reporting in the preceding paragraph will no longer be applicable.

2. NOTE: The reporting requirements contained in this part shall only apply if the 148 tons of coating limitation has been exceeded.

The permittee shall notify the Southeast District Office in writing of any record showing that the volatile organic compound content of the coatings and inks employed in this line exceeded: 40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink. The notification shall include a copy of such record and shall be sent to the Southeast District Office within 45 days after the exceedance occurs.

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3. The permittee shall submit annual reports which include the total usage of coatings and inks in all flexographic packaging rotogravure printing lines at this facility during the calendar year, in tons as well as the annual OC emissions from this emissions unit. This report shall be submitted by January 31 of each year.

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E. Testing Requirements

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

- a. Emission Limitation:

10.6 pounds of organic compounds per hour

Applicable Compliance Method:

Compliance shall be based on the following calculation, which represents the maximum rated capacity of the coating equipment using the maximum OC content coating as shown in the permit application: $(2.03 \text{ gal/hr})(5.18 \text{ lb/gal}) = 10.52 \text{ lb/hr}$.

- b. Emission Limitation:

46.4 tons of organic compounds per year

Applicable Compliance Method:

The TPY emission limitation was developed by multiplying the hourly allowable emission limitation (10.6 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term limitation, compliance shall also be shown with the annual emission limitation.

- c. Emission Limitation:

148 tons of coating in any year

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.1 and the reporting specified in section D.1 of this permit.

- d. Emission Limitation:

40% VOC by volume of the coating or ink, excluding water and exempt solvents; or 25% VOC by volume of the volatile matter in the coating or ink.

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Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2 and the reporting specified in section D.2 of this permit.

e. Emission Limitation:

Emissions of total OC shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 99.0 tons during any 12-month rolling period from the entire facility.

Applicable Compliance Method:

Compliance shall be calculated based upon the record keeping specified in Section C.1 of this permit using the equation in Section B.1.

2. Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings and cleanup materials.

F. Miscellaneous Requirements

None.