

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **08-04673**

A. Source Description

Greif Industrial Packaging LLC, produces metal pails and lids for liquid material. The PTI application is for a new roller coat operation with a natural gas oven. They are requesting federally enforceable limits on their emissions in order to limit them to avoid PSD permitting requirements for OCs and the MACT, 40 CFR Part 63, Subpart M, Miscellaneous Metal Parts & Products (surface coating) for HAPs. The following list contains the emission units that will be permitted.

- K001- Spray booth and drying oven for the exterior coating of pails
 - K002-- Interior pail and parts lining booth with lining oven
 - K006--- Roller coat operation with a natural gas oven
 - P004--- Curl and flange process for pails
 - P005--- Forming presses with flash off oven
 - K005--- Interior flange/curl spray operation sharing oven with K002
- K005 will not be in this permit but is permitted in the TV permit, issued 6/18/98. The TV permit is currently in the renewal process.

B. Facility Emissions and Attainment Status

Greif, is located in Greenville, Ohio, Darke County, which is in attainment for all criteria pollutants. There are 6 non-insignificant emission units permitted at the facility. Five of the units are included in this PTI and have a synthetic minor emissions cap to avoid PSD and MACT. K005 is already permitted under PTI # 08-04396, issued 6/20/02 and is not included in this permit. The following are the potential and restricted OC and HAP emissions facility wide including cleanup and MEK. MEK is the only pollutant used for cleanup and is only associated with K002, K005, and K006. K001 is cleaned with water.

Pre-Post Emissions Table for facility	Pre	Post	Pre	Post	Pre	Post
Emission Units, K001, K002, K005, K006, P004, and P005	OC Potential emissions in tons/yr	OC Restricted Allowable emissions in tons/yr, two shifts	Maximum Individual HAP, Potential emissions in tons/yr	Individual HAP, Restricted emissions in tons/yr, two shifts	Combined HAP potential emissions in tons/yr	Combined HAP restricted emissions in tons/yr, two shifts
Totals for PTI 08-04673	1505	153.2, Facility total	79.5	6.85	89.4	11.64

C. Source Emissions

This permit will be issued in draft and will have federally enforceable rolling, 12 month limitation of the annual emissions of 148.5 TPY OCs along with record keeping for the usage of all coatings for K001, K002, K006, P004, and P005. The following are the facilities potential and limited OC emissions, respectively. K001- 481, 84.53, K002- 668, 34.22, K006- 170, 12.98, P004- 46, 2.81, P005- 46, 7.3. The following are the facilities potential and restricted HAP emissions, respectively. K001- 3.94, 1.86, K002- 4.25, 2.02, K006- 1.84, 0.86, P004- 0, and P005- 0.

K002 and K006 have combined potential MEK emissions of 79.25 and a combined restricted emissions limitation of 6.68 TPY. Potential and restricted HAP emissions from K005 are 0.25 and 0.17 TPY respectively. The synthetic minor limitation will be 148.5 TPY of OCs.

D. Conclusion

Federal enforceability of the synthetic minor limitations will be achieved through daily record keeping and 12 month rolling emissions limitations. Therefore, through federally enforceable terms and conditions and record keeping requirements, Greif, will not trigger PSD permitting requirements and will not be subject to MACT, 40 CFR Part 63, Subpart MMMM.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
DARKE COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 08-04673

Fac ID: 0819070068

DATE: 6/7/2005

Greif Industrial Packaging and Services
Micheal Sheets
526 Markwith Ave
Greenville, OH 45331-1621

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 **\$750** 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.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

IN

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04673 FOR AN AIR CONTAMINANT SOURCE FOR
Greif Industrial Packaging and Services**

On 6/7/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Greif Industrial Packaging and Services**, located at **526 Markwith Ave, Greenville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04673:

The addition of a new roll coating operation with natural gas oven and federally enforceable limits to avoid PSD and MACT.

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.

John Paul, Regional Air Pollution Control Agency, 117 South Main street, Dayton, OH 45422-12084
[(937)225-4435]



**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 08-04673

Application Number: 08-04673
Facility ID: 0819070068
Permit Fee: **To be entered upon final issuance**
Name of Facility: Greif Industrial Packaging and Services
Person to Contact: Micheal Sheets
Address: 526 Markwith Ave
Greenville, OH 45331-1621

Location of proposed air contaminant source(s) [emissions unit(s)]:
**526 Markwith Ave
Greenville, Ohio**

Description of proposed emissions unit(s):
The addition of a new roll coating operation with natural gas oven and federally enforceable limits to avoid PSD and MACT.

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

A. State and Federally Enforceable Permit To Install General Terms and Conditions**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

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A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- 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 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.

11. 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.

12. 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.

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B. State Only Enforceable 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 of state-only enforceable 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 state-only required 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. 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.

4. 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

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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.

5. 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 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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

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if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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>
Organic Compounds- Synthetic Minor cap	148.5
Particulate emissions	12.1 (fugitive)
Single HAP	9.9
Combined HAPs	24.9

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, based on rolling, 12 month summation.

2. The permittee shall collect and record each month the following information for the entire facility:
 - a. The name and identification number of each coating as applied.
 - b. The individual Hazardous Air Pollutant (HAP)¹ content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
 - c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.2.b above).
 - d. The number of gallons of each coating employed.
 - e. The name and identification number of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.2.f above).
 - h. The number of gallons of each cleanup material employed
 - i. The total individual HAP emission rate for all the coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per 12 month rolling period (for each HAP the sum of b time d for each coating and the sum of f times h for each cleanup material).
 - j. The total combined HAP emission rate for all the coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per 12 month rolling period (for each HAP the sum of c time d for each coating and the sum of g times h for each cleanup material).

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

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3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each month during which the rolling, 12 month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12 month emission rate for each individual HAP for each such month (for the entire facility).
 - b. An identification of each month during which the rolling, 12 month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12 month total combined HAP emission rate for each such month (for the entire facility).

These quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

4. The permittee shall submit annual reports that summarize the actual annual emissions of each individual HAP and the combined emissions of all the HAPs for the facility. These reports shall cover the previous calendar year and shall be submitted by April 15th of each year.
5. Compliance with the emission limitations in Section A.2 above shall be determined in accordance with the following methods:
 - a. Emission Limitation-
9.9 tons for each individual HAP/rolling, 12 month period.

Applicable Compliance Method-
Compliance with the annual allowable individual HAP emission limitation above shall be based upon the record keeping requirements specified in Section A.2 above.
 - b. Emission Limitation-
24.9 tons for all HAPs combined/rolling, 12 month period

Applicable Compliance Method-
Compliance with the annual allowable combined HAPs emission limitation above shall be based upon the record keeping requirements specified in Section A.2 above.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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-Spray booth and drying oven for the exterior coating of pails	OAC rule 3745-31-02(A)(2)	The volatile organic compound (VOC) emissions from this emissions unit, K001, shall not exceed 84.53 tons per rolling, 12 month summation.
	OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	The organic compound (OC) emissions from emissions units K001, K002, K006, P004, and P005 combined shall not exceed 148.5 tons per rolling, 12 month summation.
	OAC rule 3745-21-09(U)(1)(f)	See term A.II.1 and the VOC coating content limitation listed below.
	OAC rule 3745-17-11(B)(1) (Based on Table I)	The particulate emissions (PE) from this emissions unit shall not exceed 1.09 lbs/hour from any stack associated with this emissions unit.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a

Greif

PTI A

Emissions Unit ID: K001

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six-minute average, except
as specified by rule.

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

1. The maximum annual coating usage rate shall not exceed 110,500 gallons based on a rolling, 12 month summation of the usage rates. Since this is an existing source, there are existing records and therefore the coating usage, in the first 12 months, does not need to be established.
2. The permittee shall operate the water-wash exhaust filtration system for particulate emission control whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K001:
 - a. The name and identification number of each coating as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
2. The permittee shall collect and record the following information each month for emissions unit K001:
 - a. The name and identification number of each coating as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating employed, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The rolling, 12 month summation of the monthly coating usage, in gallons.

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- e. The rolling, 12 month summation of the monthly VOC mass emissions rate for all the coatings i.e., [summation of (b x d) for all coatings] divided by 2000 lbs/ton.
3. The permittee shall collect and record the following information each month for emissions units K001, K002, K006, P004, and P005 combined. The rolling, 12 month summation of the monthly OC mass emissions rates in tons, for all the coatings.
4. The permittee shall maintain a log of the time(s) the water wash exhaust filtration system is not functioning.

IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. This notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 months after the exceedance occurs.
2. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the water-wash exhaust filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 months after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12 month coating usage limitation, in gallons and the actual rolling, 12 month coating usage summation, in gallons, for each such month for K001.
 - b. the rolling 12 month VOC emissions limitation, and the actual rolling 12 month VOC emissions for each such month for K001.
 - c. the rolling 12 month OC emissions limitation, and the actual rolling 12 month OC emissions for each such month for K001, K002, K006, P004, and P005 combined.
4. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

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Emissions Unit ID: K001

5. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

Issued: To be entered upon final issuance**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The VOC content for this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents as a daily volume-weighted average, for the exterior coating of a steel pail or drum.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section III.1. Formulation data or USEPA Reference Method 24 shall be used to determine the VOC content of the coatings.

- b. Emission Limitation:

The PE emissions from this emissions unit shall not exceed 1.09 lbs PE/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance shall be determined through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:

The visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations

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performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Emissions Unit ID: K001

- d. Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 84.53 TPY VOC, as a rolling 12 month summation (K001).

Applicable Compliance Method -

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1. of this permit and shall be the sum of the 12 month VOC emission rates (see Section A.III.1.).

- e. Emission Limitation -
The OC emissions from these emissions units shall not exceed 148.5 TPY OC, as a rolling 12 month summation (K001, K002, K006, P004, and P005 combined).

Applicable Compliance Method -

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III. of this permit for emissions units K001, K002, K006, P004, and P005.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. 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-Spray booth and drying oven for the exterior coating of pails		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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Emissions Unit ID: K002

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None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
K002- -Interior pail and parts lining booth and lining oven	OAC rule 3745-31-02(A)(2)	OAC rule 3745-17-11(B)(1) (Based on Table I)
	OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	OAC rule 3745-17-07(A)
	OAC rule 3745-21-09(U)(1)(e)	

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Emissions Unit ID: K002

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Applicable Emissions
Limitations/Control
Measures

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

The volatile organic compound (VOC) emissions from this emissions unit, K002, shall not exceed 34.22 tons per rolling, 12 month summation.

The organic compound (OC) emissions from emissions units K001, K002, K006, P004, and P005 combined shall not exceed 148.5 tons per rolling, 12 month summation.

See terms A.II.1 thru 3 and the VOC coating content limitation listed below.

The VOC content (as applied) of each coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average, for the interior coating of a steel pail or drum.

The particulate emissions (PE) from this emissions unit shall not exceed 1.67 lbs/hour from any stack associated with this emissions unit.

2. Additional Terms and Conditions

- 2.a** The combined OC emissions from cleanup materials for emissions units K002 and K006 shall not exceed 6.68 tons per rolling, 12 month summation.

II. Operational Restrictions

1. The maximum annual coating usage rate shall not exceed 29,000 gallons based on a rolling, 12 month summation of the usage rates. Since this is an existing source, there are existing records and therefore the coating usage, in the first 12 months, does not need to be established.
2. The maximum annual combined cleanup material usage rate for emissions units K002 and K006, combined, shall not exceed 2,013 gallons, as calculated in section III., based on a rolling, 12 month summation of the usage rates. Since this is an existing source, there are existing records and therefore the cleanup usage in the first 12 months does not need to be established.
3. The OC content of the cleanup material shall not exceed 6.72 pounds of OC per gallon.
4. The permittee shall operate the dry filter exhaust filtration system for particulate emission control whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K002:
 - a. The name and identification number of each coating as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
2. The permittee shall collect and record the following information each month for emission unit K002:
 - a. The name and identification number of each coating and cleanup material as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating employed, in pounds per gallon.
 - c. The VOC content (excluding water and exempt solvents) of the cleanup material

- employed, in pounds per gallon.
- d. The number of gallons of each coating employed.
 - e. The number of gallons of cleanup material employed.
 - f. The number of gallons of cleanup material recovered to be shipped off-site.
 - g. The rolling, 12 month summation of the monthly VOC mass emissions rate for all the coatings i.e., [summation of (b x d) for all coatings] divided by 2000 lbs/ton.
 - h. The rolling, 12 month summation of the monthly VOC mass emissions rate for all the cleanup materials i.e., [summation of c x (e - f) for all cleanup materials] divided by 2000 lbs/ton.
3. The permittee shall collect and record the following information each month for emissions units K001, K002, K006, P004, and P005 combined. The rolling, 12 month summation of the monthly OC mass emissions rates in tons, for all the coatings.
 4. The permittee shall maintain a log of the time(s) the dry filter exhaust filtration system is not functioning.

IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. This notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 months after the exceedance occurs.
2. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the dry filter exhaust filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 months after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12 month coating usage limitation, in gallons and the actual rolling, 12 month coating usage summation, in gallons, for each such month for K002.
 - b. the rolling, 12 month cleanup materials usage limitation, in gallons and the actual rolling, 12 month cleanup materials usage summation, in gallons, for each such month for K002 and K006.
 - c. the rolling, 12 month VOC emissions limitation, and the actual rolling 12 month VOC

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emissions for each such month for K002.

- d. the rolling, 12 month OC emissions limitation, and the actual rolling 12 month OC emissions for each such month for K001, K002, K006, P004, and P005 combined.
4. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
5. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
The VOC content for this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents as a daily volume-weighted average, for the interior coating of a steel pail or drum.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section III.1. Formulation data or USEPA Reference Method 24 shall be used to determine the VOC content of the coatings.

- b. Emission Limitation:
The PE emissions from this emissions unit shall not exceed 1.67 lbs PE/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Emissions Unit ID: K002

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, compliance shall be determined through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:
The visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- d. Emission Limitation -
The VOC emissions from this emissions unit shall not exceed 34.22 TPY VOC, as a rolling 12 month summation (K002)

Applicable Compliance Method -

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III. of this permit and shall be the sum of the 12 month VOC emission rates (see Section A.III.).

- e. Emission Limitation -
The OC emissions from these emissions units shall not exceed 148.5 TPY OC, as a rolling 12 month summation (K001, K002, K006, P004, and P005 combined)

Applicable Compliance Method -

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III. of this permit for emissions units K001, K002, K006, P004, and P005.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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 - -Interior pail and parts lining booth and lining oven		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
K006 - Roller coat operation with natural gas oven	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from this emissions unit, K006, shall not exceed 38.7 lbs/hr and 12.98 tons per rolling, 12 month summation.
	OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	The requirements of this rule also include compliance with the requirements of OAC rule 3754-31-05(C) and OAC rule 3745-21-09(U)(1)(e). The organic compound (OC) emissions from emissions units K001, K002, K006, P004, and P005 combined shall not exceed 148.5 tons per rolling, 12 month summation.
	OAC rule 3745-21-09(U)(1)(e)	See terms A.II.1 thru 3 and the VOC coating content limitation listed below. The VOC content (as applied) of each coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average, for the interior coating

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Emissions Unit ID: K006

of a steel pail or drum.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b** The combined OC emissions from cleanup materials for emissions units K002 and K006 shall not exceed 6.68 tons per rolling, 12 month summation.

II. Operational Restrictions

1. The maximum annual coating usage rate shall not exceed 11,000 gallons based on a rolling, 12 month summation of the usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usages specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Usage of 11,000 (Gallons)</u>
1-6	5500
1-7	6417
1-8	7333
1-9	8250
1-10	9167
1-11	10083
1-12	11000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12 month summation of the monthly usage.

2. The maximum annual combined cleanup material usage rate for emissions units K002 and K006 combined, shall not exceed 2,013 gallons, as calculated in Section III.1, based on a rolling, 12 month summation of the usage rates. Since the cleanup material usage is being transferred from K002, an existing source, there are existing records and therefore the cleanup usage in the first 12 months does not need to be established.

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3. The OC content of the cleanup material shall not exceed 6.72 pounds of OC per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit K006:
 - a. The name and identification number of each coating as applied.
 - b. The VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
2. The permittee shall collect and record the following information each month for emission unit K006:
 - a. The name and identification number of each coating and cleanup material as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating employed, in pounds per gallon.
 - c. The VOC content (excluding water and exempt solvents) of the cleanup material employed, in pounds per gallon.
 - d. The number of gallons of each coating employed.
 - e. The number of gallons of cleanup material employed.
 - f. The number of gallons of cleanup material recovered to be shipped off-site.
 - g. The rolling, 12 month summation of the monthly VOC mass emissions rate for all the coatings i.e., [summation of (b x d) for all coatings] divided by 2000 lbs/ton.
 - h. The rolling, 12 month summation of the monthly VOC mass emissions rate for all the cleanup materials i.e., [summation of c x (e - f) for all cleanup materials] divided by 2000 lbs/ton.
32. The permittee shall collect and record the following information each month for emissions units

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K001, K002, K006, P004, and P005 combined. The rolling, 12 month summation of the monthly OC mass emissions rates in tons, for all the coatings.

43. The permittee shall maintain a log of the time(s) the dry filter exhaust filtration system is not functioning.
52. The permittee shall collect and record the following information each month for emissions units K001, K002, K006, P004, and P005 combined. The rolling, 12 month summation of the monthly OC mass emissions rates in tons, for all the coatings.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. This notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 months after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12 month coating usage limitation, in gallons and the actual rolling, 12 month coating usage summation, in gallons, for each such month for K006.
 - b. the rolling, 12 month cleanup materials usage limitation, in gallons and the actual rolling, 12 month cleanup materials usage summation, in gallons, for each such month for K002 and K006.
 - c. the rolling, 12 month VOC emissions limitation, and the actual rolling 12 month VOC emissions for each such month for K006.
 - d. the rolling, 12 month OC emissions limitation, and the actual rolling 12 month OC emissions for each such month for K001, K002, K006, P004, and P005 combined.
3. These quarterly deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
4. The permittee shall submit annual reports that specify the total actual annual VOC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a. Emission Limitation:
The VOC content for this emissions unit shall not exceed 4.3 pounds of VOC per gallon

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of coating, excluding water and exempt solvents as a daily volume-weighted average, for the interior coating of a steel pail.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section III.1. Formulation data or USEPA Reference Method 24 shall be used to determine the VOC content of the coatings.

11.b. Emission Limitation -

The OC emissions from this emissions unit shall not exceed 38.7 lbs/hr VOC

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum OC content of all coatings by the maximum gallon per hour usage rate of all coatings for the emissions unit.

c1.b. Emission Limitation -

The VOC emissions from this emissions unit shall not exceed 12.98 TPY VOC, as a rolling 12 month summation (K006)

Applicable Compliance Method -

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III. of this permit and shall be the sum of the 12 month VOC emission rates (see Section A.III.).

d1.c. Emission Limitation -

The OC emissions from these emissions units shall not exceed 148.5 TPY OC, as a rolling 12 month summation (K001, K002, K006, P004, and P005 combined)

Applicable Compliance Method -

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III. of this permit for emissions units K001, K002, K006, P004, and P005.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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>
K006 - Roller coat operation with natural gas oven		Air Toxics Policy

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit (K006). To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted

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1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" each pollutant(s):

Pollutant: Methyl Ethyl Ketone, MEK

TLV ($\mu\text{g}/\text{m}^3$): 589,775

Maximum Hourly Emission Rate (lbs/hr): 38.7

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 3073

MAGLC ($\mu\text{g}/\text{m}^3$): 14,042

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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.).
23. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. The permittee can continue to comply with the allowable emission limitations specified in

its permit to install; and,

- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
P004 - Curl and flange process for pails	OAC rule 3745-31-02(A)(2)	The organic compound (OC) emissions from this emissions unit, P004, shall not exceed 2.81 tons per rolling, 12 month summation.
	OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	The organic compound (OC) emissions from emission units K001, K002, K006, P004, and P005 combined shall not exceed 148.5 tons per rolling, 12 month summation. See terms A.II.1 and 2.
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

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1. The maximum annual coating usage rate shall not exceed 800 gallons based on a rolling, 12 month summation of the usage rates. Since this is an existing source, there are existing records and therefore the coating usage, in the first 12 months does not need to be established.
2. The OC content of the coating shall not exceed 7.02 pound of OC per gallon.

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for emissions unit P004:
 - a. The name and identification number of each coating as applied.
 - b. The OC content (excluding water and exempt solvents) of each coating, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The rolling, 12 month summation of the monthly coating usage, in gallons.
 - e. The rolling, 12 month summation of the monthly OC mass emissions rate for all the coatings i.e. [summation of (b x d) for all coatings] divided by 2000 lbs/ton.

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3. The permittee shall collect and record the following information each month for emissions units K001, K002, K006, P004, and P005 combined. The rolling, 12 month summation of the monthly OC mass emissions rates in tons, for all the coatings.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings i.e., for OC content. The notification 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 months following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12 month coating usage limitation, in gallons and the actual rolling, 12 month coating usage, in gallons, for each such month.
 - b. the rolling, 12 month OC emissions limitation, and the actual rolling, 12 month OC emissions for each such month for P004.
 - c. the rolling, 12 month OC emissions limitation, and the actual rolling, 12 month OC emissions for each such month for K001, K002, K006, P004, and P005.
4. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
5. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

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- a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 2.81 TPY OC, as a rolling 12 month summation (P004).

Applicable Compliance Method -

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III. of this permit and shall be the sum of the 12 monthly OC emission rates (see Section A.III.).

- b. Emission Limitation -
The OC emissions from these emissions units shall not exceed 148.5 TPY OC, as a rolling 12 month summation (K001, K002, K006, P004, and P005 combined)

Applicable Compliance Method -

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III. of this permit.

- c. Emission Limitation -
The organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method -

Compliance with the annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in Section A.III. of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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>
P004 - Curl and flange process for pails		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Greif

PTI A

Emissions Unit ID: P005

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. 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>
P005 -Forming presses with flash off oven	OAC rule 3745-31-02(A)(2)	The organic compound (OC) emissions from this emissions unit, P005, shall not exceed 7.3 tons per rolling, 12 month summation.
	OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	The organic compound (OC) emissions from emission units K001, K002, K006, P004, and P005 combined shall not exceed 148.5 tons per rolling, 12-month summation. See terms A.II.1 and 2.
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

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Emissions Unit ID: P005

Issued: To be entered upon final issuance

1. The maximum annual coating usage rate shall not exceed 3,300 gallons based on a rolling, 12 month summation of the usage rates. Since this is an existing source, there are existing records and therefore the coating usage, in the first 12 months does not need to be established.
2. The OC content of the coating shall not exceed 7.02 pound of OC per gallon.

Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and photochemically reactive cleanup material employed.
 - b. The number of gallons of each coating and photochemically reactive cleanup material employed.
 - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for emissions unit P005:
 - a. The name and identification number of each coating as applied.
 - b. The OC content (excluding water and exempt solvents) of each coating, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The rolling, 12 month summation of the monthly coating usage, in gallons.
 - e. The rolling, 12 month summation of the monthly OC mass emissions rate for all the coatings i.e. [summation of (b x d) for all coatings] divided by 2000 lbs/ton.

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Emissions Unit ID: P005

3. The permittee shall collect and record the following information each month for emissions units K001, K002, K006, P004, and P005 combined. The rolling, 12 month summation of the monthly OC mass emissions rates in tons, for all the coatings.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings i.e., for OC content. The notification 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 months following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12 month coating usage limitation, in gallons and the actual rolling, 12 month coating usage, in gallons, for each such month.
 - b. the rolling, 12 month OC emissions limitation, and the actual rolling, 12 month OC emissions for each such month for P005.
 - c. the rolling, 12 month OC emissions limitation, and the actual rolling, 12 month OC emissions for each such month for K001, K002, K006, P004, and P005.
4. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
5. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

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Emissions Unit ID: P005

Issued: To be entered upon final issuance

- a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 7.3 TPY OC, as a rolling 12 month summation (P005)

Applicable Compliance Method -

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III. of this permit and shall be the sum of the 12 monthly OC emission rates (see Section A.III.).

- b. Emission Limitation -
The OC emissions from these emissions units shall not exceed 148.5 TPY OC, as a rolling 12 month summation (K001, K002, K006, P004, and P005 combined)

Applicable Compliance Method -

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III of this permit.

- c. Emission Limitation -
The organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method -

Compliance with the annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in Section A.III. of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. 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>
P005 Forming presses with flash off oven		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None