



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL  
KNOX COUNTY  
Application No: 01-08484**

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

**DATE: 9/12/2002**

Weyerhaeuser Company  
Mark Boucher  
8800 Granville Road  
Mount Vernon, OH 43050

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

CDO



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Permit To Install  
Terms and Conditions

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Issue Date: 9/12/2002  
Effective Date: 9/12/2002

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**FINAL PERMIT TO INSTALL 01-08484**

Application Number: 01-08484  
APS Premise Number: 0142010051  
Permit Fee: **\$1800**  
Name of Facility: Weyerhaeuser Company  
Person to Contact: Mark Boucher  
Address: 8800 Granville Road  
Mount Vernon, OH 43050

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**8800 Granville Road**  
**Mount Vernon, Ohio**

Description of proposed emissions unit(s):  
**Corrugated containerboard operation.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

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

#### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

#### **3. Records Retention Requirements**

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

#### **4. Inspections and Information Requests**

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

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

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

**14. Construction Compliance Certification**

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>
VOCs	19.39
TSP	12.45
HAPs	0.71

**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>
P001 - Pneumatic Scrap Paper Collection Cyclone	OAC rule 3745-31-05 (A)(3)	Particulate emissions shall not exceed 2.84 lbs/hr and 12.4 tons/yr.  The requirements of this rule also includes compliance with the requirements of OAC rules 3745-17-07.
	OAC rule 3745-17-07 (A)(1)	Visible emissions shall not exceed 20 percent opacity, as a 6-minute average.
	OAC rule 3745-17-11 (B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**

- 2.a The hourly and annual emission limitations were 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.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

None

**D. Reporting Requirements**

None

**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:  
Particulate matter shall not exceed 2.84 lbs/hr and 12.4 tons/yr.

Applicable compliance method:

- i. Emissions generated by the 2424 Rotary Die Cutter and transferred to the cyclone

The short term emissions are determined by multiplying the maximum hourly waste generated by the emission factor that is based on a stack test at a similar facility and dividing by 2,000 pounds per ton. The annual emission limitation is determined by multiplying the restricted maximum production by the percentage of waste generated, multiplying by the waste weight, dividing by 2,000 pounds per ton, multiplying by the emission factor that is based on a stack test at a similar facility and dividing by 2,000 pounds per ton.

- ii. Emissions generated by the 2444 Rotary Die Cutter and transferred to the cyclone

The short term emissions are determined by multiplying the maximum hourly waste generated by the emission factor that is based on a stack test at a similar facility and multiplying by 1 ton / 2,000 pounds. The annual emission limitation is determined by multiplying the restricted maximum production by the percentage of waste generated, multiplying by the waste weight, dividing by 2,000 pounds per ton, multiplying by the emission factor that is based on a stack test at a similar facility and dividing by 2,000 pounds per ton.

- iii. Emissions generated by the 3410 Sun Printer Slotter and transferred to the cyclone

The short term emissions are determined by multiplying the maximum hourly waste generated by the emission factor that is based on a stack test at a similar facility and multiplying by 1 ton / 2,000 pounds. The annual emission limitation

is determined by multiplying the restricted maximum production by the percentage of waste generated, multiplying by the waste weight, dividing by 2,000 pounds per ton, multiplying by the emission factor that is based on a stack test at a similar facility and dividing by 2,000 pounds per ton.

- iv. Emissions generated by the corrugator and transferred to the cyclone

The short term emissions are determined by multiplying the hourly production rate by the emission factor that is based on VOC pollution emission rate data. The annual emission limitation is determined by multiplying the maximum production by the emission factor that is based VOC pollution emission rate data and dividing by 2,000 pounds per ton.

- b. Emission limitation:  
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable compliance method:

If required, compliance shall be determined through visible emissions 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).

**F. Miscellaneous Requirements**

None

**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>
P002 - 17,600 gallon powdered starch storage silo with fabric filter baghouse	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions shall not exceed 0.03 lb/hr and 0.009 ton/yr.</p> <p>The silo shall be adequately enclosed and vented to the fabric filter; the enclosure shall be sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture.</p> <p>The fabric filter shall achieve an outlet emission rate of not greater than 0.020 grain of particulate emissions per dry standard cubic feet of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent.</p>
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also includes compliance with the requirements of OAC rules 3745-17-07.
	OAC rule 3745-17-11(B)	<p>Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a 6-minute average.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established</p>

pursuant to OAC rule 3745-31-05  
(A)(3).

## 2. Additional Terms and Conditions

- 2.a** The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

Starch storage silo

- 2.b** The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

material handling operation(s)

control measure(s)

Starch storage silo

Fabric filters

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c** For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.
- 2.d** Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of 3745-31-05(A)(3).
- 2.e** The 0.03 lb/hr emission limitation was established to reflect the potential to emit (PTE) for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

## B. Operational Restrictions

1. The maximum amount of starch received each year shall not exceed 47,000 lbs starch/day and 5,217 tons starch/yr.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records indicating the number of pounds of starch received.
2. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

<u>material handling operation(s)</u>	<u>minimum inspection frequency</u>
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Starch storage silo	Daily
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3. The above-mentioned inspections shall be performed during representative, normal operating conditions.
4. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
5. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s):
  - c. the dates the control measure(s) was (were) implemented; and
  - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 4.d. shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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

1. The permittee shall submit monthly reports indicating the number of total pounds of starch received by the facility. These reports shall be submitted to the Central District Office.
2. The permittee shall submit semiannual reports which (a) identify all days during which any abnormal visible fugitive particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible fugitive particulate emissions. These reports shall be submitted to the Director of the Central District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

**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:  
Particulate matter shall not exceed 0.03 lb/hr and 0.009 ton/yr.

Applicable compliance method:

The short term emissions shall be determined by multiplying the amount of starch received per day by the emission factor that is provided and derived from AP-42 11.12-4, table 11.12-2, multiplying by control efficiency and dividing by the number of hours per delivery. The annual emission limitation shall be determined by multiplying the amount of starch received by the emission factor, multiplying by the control efficiency and dividing by 2,000 pounds per ton.

**F. Miscellaneous Requirements**

None

**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>
P003 - Corrugator	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 4.38 lbs/hr and 13.35 tons/rolling, 12-month summation.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-09(f) and 3745-31-05(D).</p>
	OAC rule 3745-21-09(F)	See A.2.b.
	OAC rule 3745-31-05(D)	<p>VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month summation.</p> <p>See terms B.1, 2, and 3.</p>

**2. Additional Terms and Conditions**

- 2.a The permittee shall not employ more than 19.39 tons of VOC per rolling, 12-month period based upon the monthly VOC input rates to emission units P003-P009.

\*Monthly VOC input rate =  $(C \times D) + (E \times F)$  where C = the number of gallons of each coating/cleanup materials employed per month; D = the average VOC content of each coating /cleanup material employed in pounds of VOC per gallon of coating/cleanup materials being emitted; E = restricted maximum production of corrugator (P003); and F = VOC emission factor associated with the product processed on the corrugator. Monthly VOC input rates are equivalent to monthly VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.b** The maximum VOC content shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**B. Operational Restrictions**

1. The maximum production of the corrugator shall not exceed 3,532,087 million square feet (msf) of product/rolling, 12-month summation.
2. For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling, 12-month production (msf/rolling twelve-months), and VOC emissions shall be calculated based upon the actual production and VOC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
3. The maximum annual HAPs material usage (from inks, coatings and adhesives) for emission units P003-P009 shall not exceed 10.0 tons/year for any individual HAP (IHAP) and 25.0 tons/year for any combination of HAPs (CHAP), based upon a rolling, 12-month summation.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain daily records indicating the number of square feet produced by the corrugator.
2. The permittee shall maintain monthly records indicating the rolling, 12-month summation of VOC emissions for emission units P003-P009 combined, in tons.
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
  - d. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight.; and,
  - e. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials © x d for each material), in pounds per month.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific “gallons/year” and “tons/year” limitations, or just a “tons/year” limitation in a Permit to Install. In such cases, for each such new emissions unit

only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

4. The permittee shall maintain monthly records indicating the rolling, 12-month summation of individual and combined HAP emissions for emission units P003-P009 combined, in tons.

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

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month tons of VOC limitation for emission units P003-P009 and/or the restricted maximum square feet production for P003.
2. The permittee shall also submit annual reports which specify the total VOC emissions from P003-P009 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly deviation (excursion) reports which identify each month during which the rolling, 12-month individual and or combined HAPs emissions, from the use of inks, coating, adhesives and cleanup material for emission units P003-P009 exceed 10 tons/year for IHAPs and/or 25 tons/year for CHAPs.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The 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 days following the end of the calendar month.
5. These quarterly deviation (excursion) reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.

#### **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:  
VOC emissions shall not exceed 4.38 lbs/hr.

Applicable compliance method:

Compliance with the short term emission limitation shall be demonstrated by multiplying the restricted maximum production by the emission factor that is based on test data from a similar facility and dividing by 24 hours per day.

- b. Emission limitation:  
VOC emissions shall not exceed 13.35 tons/yr.

Applicable compliance method:

Compliance with the annual emission limitation shall be demonstrated by multiplying the restricted maximum production by the emission factor that is based on test data from a similar facility and dividing by 2,000 pounds per ton.

- c. Emission limitation:  
VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month summation.

Applicable compliance method:

Compliance shall be demonstrated by summing the emissions from P003-P009. For P003, see Section E.1.b and for emission units P004-P009, see Sections C.1.a-e.

- d. Emission limitation:  
Individual and combined HAP emissions shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable compliance method:

Compliance shall be demonstrated by summing the emissions for emission units P003-P009. For P003, see Section C.4 and for emission units P004-P009, see Sections C.1.a-e.

## **F. Miscellaneous Requirements**

None

**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>
P004 - Flexographic printing press with 2424 Ward Rotary Die Cutter	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 44 pounds per hour and 0.84 ton per year.  The requirements with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).  See A.2.c, B.1 and B.2 below.
	OAC rule 3745-31-05(D)	VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period. See 2.c.
	OAC rule 3745-21-09(Y)(1)(a)	The percent by volume limitation of this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The 44 pounds per hour emissions 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 permittee shall not employ more than 19.39 tons of VOC per rolling, 12-month period based upon the monthly VOC input rates to emission units P003-P009.

\*Monthly VOC input rate =  $(C \times D) + (E \times F)$  where C = the number of gallons of each coating/cleanup materials employed per month; D = the average VOC content of each coating employed in pounds of VOC per gallon of coating materials being emitted; E = restricted maximum production of corrugator (P003); and F = VOC emission factor. Monthly VOC input rates are equivalent to monthly VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.c** The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 10 tons and 25 tons per year, respectively, by limiting the total VOC emissions from P003-P009 to 19.39 tons per rolling, 12-month summation.

## **B. Operational Restrictions**

1. For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling, 12-month coating usage (weight, in pounds/rolling twelve-months) and VOC emissions shall be calculated based upon the actual coating usage and VOC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
2. The maximum annual HAPs material usage (from inks, coatings and adhesives) for emission units P003-P009 shall not exceed 10.0 tons/year for any individual HAP (IHAP) and 25.0 tons/year for any combination of HAPs (CHAP), based upon a rolling, 12-month summation.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month on a facility-wide basis for emission units P004, P005, P006, P007, P008 and P009:
  - a. the name and identification of each ink, coating, adhesive and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
  - c. the VOC content of each ink, coating, adhesive and cleanup material (excluding water and exempt solvents), as applied, in percent weight;
  - d. the total volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials (calculated by summing the records from b x c), in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials, in tons;

- f. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- g. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x f for each material), in pounds per month; and
- h. the rolling, 12-month summation of IHAPS and CHAPS material usage and emissions from all inks, coatings, adhesives and cleanup materials, in tons.

The annual VOC, IHAP and CHAP emissions will be calculated as the sum of the 12 monthly VOC, IHAP and CHAP emission rates for the calendar year. The total annual VOC emission limit for emission units P003-P009 combined shall be 19.39 tons VOC/rolling, 12-month period.

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

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month tons of VOC emissions for emission units P003-P009. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
- 2. The permittee shall submit quarterly deviation (excursion) reports which identify each month during which the rolling, 12-month individual and or combined HAPs emissions, from the use of inks, coating, adhesives and cleanup material for emission units P003-P009 exceed 10 tons/year for IHAPs and/or 25 tons/year for CHAPs. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
- 3. The permittee shall also submit annual reports which specify the total VOC, IHAP and CHAP emissions for emission units P003-P009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
44 lbs VOC/hr

**Applicable Compliance Method:**

Compliance with the short term limitation shall be demonstrated by multiplying the maximum hourly amount of material produced (645 msf/hr, application, 9/5/01) by the amount of coating used per amount of board produced (1.0 lbs ink/msf, application, 9/5/01) by the maximum VOC content of the coating (6.82 % VOC by weight, application, 9/5/01).

- b. Emission Limitation:  
0.84 ton VOC/yr

Applicable Compliance Method:

The record keeping requirements in Part II, Section C.1.a-e of this permit shall be used to determine compliance with the above limitations.

- c. Emission limitation:  
VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period.

Applicable compliance method:

Compliance shall be demonstrated by summing the emission from P003-P009. For P003, see Section E.1.b and for emission units P004-P009, see Sections C.1.a-e .

- d. Emission limitation:  
Individual and combined HAP emissions shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable compliance method:

Compliance shall be demonstrated by rolling, 12-month summation for emission units P003-P009 based on the recordkeeping under section C.1.a-h.

**F. Miscellaneous Requirements**

None

**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>
P005 - Flexographic printing press with 2444 Ward Rotary Die Cutter	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 40.2 pounds per hour and 0.75 ton per year.</p> <p>The requirements with this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See A.2.c, B.1 and B.2 below.</p>
	OAC rule 3745-31-05(D)	VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period. See 2.c.
	OAC rule 3745-21-09(Y)(1)(a)	The percent by volume limitation of this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The 40.2 pounds per hour emissions 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 permittee shall not employ more than 19.39 tons of VOC per rolling, 12-month period based upon the monthly VOC input rates to emission units P003-P009.

\*Monthly VOC input rate =  $\text{C} \times \text{D} + (\text{E} \times \text{F})$  where C = the number of gallons of each coating/cleanup materials employed per month; D = the average VOC content of each coating employed in pounds of VOC per gallon of coating materials being emitted; E = restricted maximum production of corrugator (P003); and F = VOC emission factor. Monthly VOC input rates are equivalent to monthly VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.c** The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 10 tons and 25 tons per year, respectively, by limiting the total VOC emissions from P003-P009.

## **B. Operational Restrictions**

1. For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling, 12-month coating usage (weight, in pounds/rolling twelve-months) and VOC emissions shall be calculated based upon the actual coating usage and VOC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
2. The maximum annual HAPs material usage (from inks, coatings and adhesives) for emission units P003-P009 shall not exceed 10.0 tons/year for any individual HAP (IHAP) and 25.0 tons/year for any combination of HAPs (CHAP), based upon a rolling, 12-month summation.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month on a facility-wide basis for emission units P004, P005, P006, P007, P008 and P009:
  - a. the name and identification of each ink, coating, adhesive and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
  - c. the VOC content of each ink, coating, adhesive and cleanup material (excluding water and exempt solvents), as applied, in percent weight;
  - d. the total volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials (calculated by summing the records from b x c), in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials, in tons;

- f. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- g. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x f for each material), in pounds per month; and
- h. the rolling, 12-month summation of IHAPS and CHAPS material usage and emissions from all inks, coatings, adhesives and cleanup materials, in tons.

The annual VOC, IHAP, and CHAP emissions will be calculated as the sum of the 12 monthly VOC, IHAP, and CHAP emission rates for the calendar year. The total annual VOC emission limit for emission units P003-P009 combined shall be 19.39 tons VOC/year.

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

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month tons of VOC emissions for emission units P003-P009. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
- 2. The permittee shall submit quarterly deviation (excursion) reports which identify each month during which the rolling, 12-month individual and or combined HAPs emissions, from the use of inks, coating, adhesives and cleanup material for emission units P003-P009 exceed 10 tons/year for IHAPs and/or 25 tons/year for CHAPs. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
- 3. The permittee shall also submit annual reports which specify the total VOC, IHAP, and CHAP emissions for emission units P003-P009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
40.2 lbs VOC/hr

**Applicable Compliance Method:**

Compliance with the short term limitation shall be demonstrated by multiplying the maximum hourly amount of material produced (590 msf/hr, application, 9/5/01) by the amount of coating used per amount of board produced (1.0 lbs ink/msf, application, 9/5/01) by the maximum VOC content of the coating (6.82 % VOC by weight, application, 9/5/01).

- b. Emission Limitation:  
0.75 ton VOC/yr

Applicable Compliance Method:

The record keeping requirements in Part II, Section C.1.a-e of this permit shall be used to determine compliance with the above limitations.

- c. Emission limitation:  
VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period.

Applicable compliance method:

Compliance shall be demonstrated by summing the emission from P003-P009. For P003, see Section E.1.b and for emission units P004-P009, see Sections C.1.a-e.

- d. Emission limitation:  
Individual and combined HAP emissions shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable compliance method:

Compliance shall be demonstrated by rolling, 12-month summation for emission units P003-P009 based on the recordkeeping under section C.1.a-h.

**F. Miscellaneous Requirements**

None

**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>
P006 - Flexographic 3410 Sun Printer Slotter	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 4.01 pounds per hour and 0.81 ton per year.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See A.2.c, B.1 and B.2 below.</p>
	OAC rule 3745-31-05(D)	VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period. See 2.c.
	OAC rule 3745-21-09(Y)(1)(a)	The percent by volume limitation of this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The 4.01 pounds per hour emissions 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 permittee shall not employ more than 19.39 tons of VOC per rolling, 12-month period based upon the monthly VOC input rates to emission units P003-P009.

\*Monthly VOC input rate =  $(C \times D) + (E \times F)$  where C = the number of gallons of each coating/cleanup materials employed per month; D = the average VOC content of each coating employed in pounds of VOC per gallon of coating materials being emitted; E = restricted maximum production of corrugator (P003); and F = VOC emission factor. Monthly VOC input rates are equivalent to monthly VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.c** The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 10 tons and 25 tons per year, respectively, by limiting the total VOC emissions from P003-P009.

## **B. Operational Restrictions**

1. For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling, 12-month coating usage (weight, in pounds/rolling twelve-months) and VOC emissions shall be calculated based upon the actual coating usage and VOC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
2. The maximum annual HAPs material usage (from inks, coatings and adhesives) for emission units P003-P009 shall not exceed 10.0 tons/year for any individual HAP (IHAP) and 25.0 tons/year for any combination of HAPs (CHAP), based upon a rolling, 12-month summation.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month on a facility-wide basis for emission units P004, P005, P006, P007, P008 and P009:
  - a. the name and identification of each ink, coating, adhesive and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
  - c. the VOC content of each ink, coating, adhesive and cleanup material (excluding water and exempt solvents), as applied, in percent weight;
  - d. the total volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials (calculated by summing the records from b x c), in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials, in tons;

- f. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- g. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x f for each material), in pounds per month; and
- h. the rolling, 12-month summation of IHAPS and CHAPS material usage and emissions from all inks, coatings, adhesives and cleanup materials, in tons.

The annual VOC, IHAP, and CHAP emissions will be calculated as the sum of the 12 monthly VOC, IHAP, and CHAP emission rates for the calendar year. The total annual VOC emission limit for emission units P003-P009 combined shall be 19.39 tons VOC/rolling, 12-month period.

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

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month tons of VOC emissions for emission units P003-P009. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
- 2. The permittee shall submit quarterly deviation (excursion) reports which identify each month during which the rolling, 12-month individual and or combined HAPs emissions, from the use of inks, coating, adhesives and cleanup material for emission units P003-P009 exceed 10 tons/year for IHAPs and/or 25 tons/year for CHAPs. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
- 3. The permittee shall also submit annual reports which specify the total VOC, IHAP, and CHAP emissions for emission units P003-P009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
4.01 lbs VOC/hr

**Applicable Compliance Method:**

Compliance with the short term limitation shall be demonstrated by multiplying the maximum hourly amount of material produced (342 msf/hr, application, 9/5/01) by the amount of coating used per amount of board produced (1.0 lbs ink/msf, application, 9/5/01) by the maximum VOC content of the coating (6.82 % VOC by weight, application, 9/5/01).

- b. Emission Limitation:  
0.81 ton VOC/yr

Applicable Compliance Method:

The record keeping requirements in Part II, Section C.1.a-e of this permit shall be used to determine compliance with the above limitations.

- c. Emission limitation:  
VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period.

Applicable compliance method:

Compliance shall be demonstrated by summing the emission from P003-P009. For P003, see Section E.1.b and for emission units P004-P009, see Sections C.1.a-e.

- d. Emission limitation:  
Individual and combined HAP emissions shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable compliance method:

Compliance shall be demonstrated by rolling, 12-month summation for emission units P003-P009 based on the recordkeeping under section C.1.a-h.

**F. Miscellaneous Requirements**

None

**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>
P007 - Flexographic 5126 Langston Saturn III Sun Auto Flexo Folder Gluer	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 5.33 pounds per hour and 1.03 tons per year.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See A.2.c, B.1 and B.2 below.</p>
	OAC rule 3745-31-05(D)	VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period. See 2.c.
	OAC rule 3745-21-09(Y)(1)(a)	The percent by volume limitation of this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

**2.a** The 5.33 pounds per hour emissions 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 permittee shall not employ more than 19.39 tons of VOC per rolling, 12-month period based upon the monthly VOC input rates to emission units P003-P009.

\*Monthly VOC input rate =  $(C \times D) + (E \times F)$  where C = the number of gallons of each coating/cleanup materials employed per month; D = the average VOC content of each coating employed in pounds of VOC per gallon of coating materials being emitted; E = restricted maximum production of corrugator (P003); and F = VOC emission factor. Monthly VOC input rates are equivalent to monthly VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

**2.c** The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 10 tons and 25 tons per year, respectively, by limiting the total VOC emissions from P003-P009.

## **B. Operational Restrictions**

1. For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling, 12-month coating usage (weight, in pounds/rolling twelve-months) and VOC emissions shall be calculated based upon the actual coating usage and VOC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
2. The maximum annual HAPs material usage (from inks, coatings and adhesives) for emission units P003-P009 shall not exceed 10.0 tons/year for any individual HAP (IHAP) and 25.0 tons/year for any combination of HAPs (CHAP), based upon a rolling, 12-month summation.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month on a facility-wide basis for emission units P004, P005, P006, P007, P008 and P009:
  - a. the name and identification of each ink, coating, adhesive and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
  - c. the VOC content of each ink, coating, adhesive and cleanup material (excluding water and exempt solvents), as applied, in percent weight;

- d. the total volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials (calculated by summing the records from b x c), in pounds per month;
- e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials, in tons;
- f. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- g. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x f for each material), in pounds per month; and
- h. the rolling, 12-month summation of IHAPS and CHAPS material usage and emissions from all inks, coatings, adhesives and cleanup materials, in tons.

The annual VOC, IHAP, and CHAP emissions will be calculated as the sum of the 12 monthly VOC, IHAP, and CHAP emission rates for the calendar year. The total annual VOC emission limit for emission units P003-P009 combined shall be 19.39 tons VOC/rolling, 12-month period.

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

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month tons of VOC emissions for emission units P003-P009. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
2. The permittee shall submit quarterly deviation (excursion) reports which identify each month during which the rolling, 12-month individual and or combined HAPs emissions, from the use of inks, coating, adhesives and cleanup material for emission units P003-P009 exceed 10 tons/year for IHAPs and/or 25 tons/year for CHAPs. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
3. The permittee shall also submit annual reports which specify the total VOC, IHAP, and CHAP emissions for emission units P003-P009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
5.33 lbs VOC/hr

Applicable Compliance Method:

Compliance with the short term limitation shall be demonstrated by multiplying the maximum hourly amount of material produced (400.5 msf/hr, application, 9/5/01) by the amount of coating used per amount of board produced (0.172 lbs ink/msf, 0.168 lb adhesive/msf, 0.0512 lb resyn/msf, application, 9/5/01) by the maximum VOC content of the coating (6.82 % ink, 0.90 % adhesive, 0.10 % resyn VOC by weight, application, 9/5/01).

- b. Emission Limitation:  
1.03 tons VOC/yr

Applicable Compliance Method:

The record keeping requirements in Part II, Section C.1.a-e of this permit shall be used to determine compliance with the above limitations.

- c. Emission limitation:  
VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period.

Applicable compliance method:

Compliance shall be demonstrated by summing the emission from P003-P009. For P003, see Section E.1.b and for emission units P004-P009, see Sections C.1.a-e.

- d. Emission limitation:  
Individual and combined HAP emissions shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable compliance method:

Compliance shall be demonstrated by rolling, 12-month summation for emission units P003-P009 based on the recordkeeping under section C.1.a-h.

**F. Miscellaneous Requirements**

None

**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>
P008 - Flexographic 5136 Sun Auto Flexo Folder Gluer	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 5.33 pounds per hour and 1.25 tons per year.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See A.2.c, B.1 and B.2 below.</p>
	OAC rule 3745-31-05(D)	VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period. See 2.c.
	OAC rule 3745-21-09(Y)(1)(a)	The percent by volume limitation of this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The 5.33 pounds per hour emissions 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 permittee shall not employ more than 19.39 tons of VOC per rolling, 12-month period based upon the monthly VOC input rates to emission units P003-P009.

\*Monthly VOC input rate =  $(C \times D) + (E \times F)$  where C = the number of gallons of each coating/cleanup materials employed per month; D = the average VOC content of each coating employed in pounds of VOC per gallon of coating materials being emitted; E = restricted maximum production of corrugator (P003); and F = VOC emission factor. Monthly VOC input rates are equivalent to monthly VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.c** The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 10 tons and 25 tons per year, respectively, by limiting the total VOC emissions from P003-P009.

## **B. Operational Restrictions**

1. For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling, 12-month coating usage (weight, in pounds/rolling twelve-months) and VOC emissions shall be calculated based upon the actual coating usage and VOC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
2. The maximum annual HAPs material usage (from inks, coatings and adhesives) for emission units P003-P009 shall not exceed 10.0 tons/year for any individual HAP (IHAP) and 25.0 tons/year for any combination of HAPs (CHAP), based upon a rolling, 12-month summation.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month on a facility-wide basis for emission units P004, P005, P006, P007, P008 and P009:
  - a. the name and identification of each ink, coating, adhesive and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
  - c. the VOC content of each ink, coating, adhesive and cleanup material (excluding water and exempt solvents), as applied, in percent weight;
  - d. the total volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials (calculated by summing the records from b x c), in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials, in tons;
  - f. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;

- g. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x f for each material), in pounds per month; and
- h. the rolling, 12-month summation of IHAPS and CHAPS material usage and emissions from all inks, coatings, adhesives and cleanup materials, in tons.

The annual VOC, IHAP, and CHAP emissions will be calculated as the sum of the 12 monthly VOC, IHAP, and CHAP emission rates for the calendar year. The total annual VOC emission limit for emission units P003-P009 combined shall be 19.39 tons VOC/rolling, 12-month period.

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

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month tons of VOC emissions for emission units P003-P009. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
2. The permittee shall submit quarterly deviation (excursion) reports which identify each month during which the rolling, 12-month individual and or combined HAPs emissions, from the use of inks, coating, adhesives and cleanup material for emission units P003-P009 exceed 10 tons/year for IHAPs and/or 25 tons/year for CHAPs. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
3. The permittee shall also submit annual reports which specify the total VOC, IHAP, and CHAP emissions for emission units P003-P009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

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

- a. Emission Limitations:  
5.33 lbs VOC/hr

**Applicable Compliance Method:**

Compliance with the short term limitation shall be demonstrated by multiplying the maximum hourly amount of material produced (400.5 msf/hr, application, 9/5/01) by the amount of coating used per amount of board produced (0.172 lbs ink/msf, 0.168 lb adhesive/msf, 0.0512 lb resyn/msf, application, 9/5/01) by the maximum VOC content of the coating (6.82 % ink, 0.90 % adhesive, 0.10 % resyn VOC by weight, application, 9/5/01).

- b. Emission Limitation:  
1.25 tons VOC/yr

Applicable Compliance Method:

The record keeping requirements in Part II, Section C.1.a-e of this permit shall be used to determine compliance with the above limitations.

- c. Emission limitation:  
VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period.

Applicable compliance method:

Compliance shall be demonstrated by summing the emission from P003-P009. For P003, see Section E.1.b and for emission units P004-P009, see Sections C.1.a-e.

- d. Emission limitation:  
Individual and combined HAP emissions shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable compliance method:

Compliance shall be demonstrated by rolling, 12-month summation for emission units P003-P009 based on the recordkeeping under section C.1.a-h.

**F. Miscellaneous Requirements**

None

**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>
P009 - Flexographic 5190 Langston Saturn II Sun Auto Flexo Folder Gluer	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 5.33 pounds per hour and 1.35 tons per year.</p> <p>The requirements of this rule also includes compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See A.2.c, B.1 and B.2 below.</p>
	OAC rule 3745-31-05(D)	VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period. See 2.c.
	OAC rule 3745-21-09(Y)(1)(a)	The percent by volume limitation of this rule is less stringent than the limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The 5.33 pounds per hour emissions 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 permittee shall not employ more than 19.39 tons of VOC per rolling, 12-month period based upon the monthly VOC input rates to emission units P003-P009.

\*Monthly VOC input rate =  $(C \times D) + (E \times F)$  where C = the number of gallons of each coating/cleanup materials employed per month; D = the average VOC content of each coating employed in pounds of VOC per gallon of coating materials being emitted; E = restricted maximum production of corrugator (P003); and F = VOC emission factor. Monthly VOC input rates are equivalent to monthly VOC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.c** The facility-wide individual and combined hazardous air pollutant (HAP) emissions are effectively limited to less than 10 tons and 25 tons per year, respectively, by limiting the total VOC emissions from P003-P009.

## **B. Operational Restrictions**

1. For the purpose of demonstrating compliance during the initial twelve months of operation covered by this permit, the rolling, 12-month coating usage (weight, in pounds/rolling twelve-months) and VOC emissions shall be calculated based upon the actual coating usage and VOC emissions from this emissions unit initially including the twelve month period prior to issuance of this PTI and rolling with each passing month.
2. The maximum annual HAPs material usage (from inks, coatings and adhesives) for emission units P003-P009 shall not exceed 10.0 tons/year for any individual HAP (IHAP) and 25.0 tons/year for any combination of HAPs (CHAP), based upon a rolling, 12-month summation.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month on a facility-wide basis for emission units P004, P005, P006, P007, P008 and P009:
  - a. the name and identification of each ink, coating, adhesive and cleanup material employed;
  - b. the weight, in pounds per month, of each ink, coating, adhesive and cleanup material employed, as applied;
  - c. the VOC content of each ink, coating, adhesive and cleanup material (excluding water and exempt solvents), as applied, in percent weight;
  - d. the total volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials (calculated by summing the records from b x c), in pounds per month;
  - e. the rolling, 12-month summation of volatile organic material usage and VOC emissions from all inks, coatings, adhesives and cleanup materials, in tons;

- f. the individual and combined HAPs contents of each ink, coating, adhesive and cleanup material, as applied, in percent by weight;
- g. the total individual and combined HAPs material usage and emissions from all inks, coatings, adhesives and cleanup materials (b x f for each material), in pounds per month; and
- h. the rolling, 12-month summation of IHAPS and CHAPS material usage and emissions from all inks, coatings, adhesives and cleanup materials, in tons.

The annual VOC, IHAP, and CHAP emissions will be calculated as the sum of the 12 monthly VOC, IHAP, and CHAP emission rates for the calendar year. The total annual VOC emission limit for emission units P003-P009 combined shall be 19.39 tons VOC/rolling, 12-month period.

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

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month tons of VOC emissions for emission units P003-P009. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
- 2. The permittee shall submit quarterly deviation (excursion) reports which identify each month during which the rolling, 12-month individual and or combined HAPs emissions, from the use of inks, coating, adhesives and cleanup material for emission units P003-P009 exceed 10 tons/year for IHAPs and/or 25 tons/year for CHAPs. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.1.
- 3. The permittee shall also submit annual reports which specify the total VOC, IHAP, and CHAP emissions for emission units P003-P009 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

- 1. Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitations:  
5.33 lbs VOC/hr

**Applicable Compliance Method:**

Compliance with the short term limitation shall be demonstrated by multiplying the maximum hourly amount of material produced (400.5 msf/hr, application, 9/5/01) by the amount of coating used per amount of board produced (0.172 lbs ink/msf, 0.168 lb adhesive/msf, 0.0512 lb resyn/msf, application, 9/5/01) by the maximum VOC content of

the coating (6.82 % ink, 0.90 % adhesive, 0.10 % resyn VOC by weight, application, 9/5/01).

- b. Emission Limitation:  
1.35 tons VOC/yr

Applicable Compliance Method:

The record keeping requirements in Part II, Section C.1.a-e of this permit shall be used to determine compliance with the above limitations.

- c. Emission limitation:  
VOC emissions from emission units P003-P009 shall not exceed 19.39 tons per rolling, 12-month period.

Applicable compliance method:

Compliance shall be demonstrated by summing the emission from P003-P009. For P003, see Section E.1.b and for emission units P004-P009, see Sections C.1.a-e.

- d. Emission limitation:  
Individual and combined HAP emissions shall not exceed 9.9 tons per year and 24.9 tons per year, respectively.

Applicable compliance method:

Compliance shall be demonstrated by rolling, 12-month summation for emission units P003-P009 based on the recordkeeping under section C.1.a-h.

**F. Miscellaneous Requirements**

None