

Statement of Basis For Title V Permit

Part I - General	
Company Name	Graphic Packaging International, Inc.
Premise Number	1431150945
What makes this facility a Title V facility?	VOC
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)
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Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
B.1.			Listing of insignificant emission units

C Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		N D	O R	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K001	509.93 lbs VOC/day	N	Y OAC rule 3745-31- 05	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emissions unit and not subject to CAM. OR, M, R, Rp - The lbs VOC/day was based on the emission units potential to emit (worse case coating/maximum gallons per day usage). Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculation is in the testing section. ET- No stack test is required; emissions are based on MSDS and usage information.
	17.86 lbs Ammonia/day	N	Y OAC rule 3745-31- 05	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emissions unit and not subject to CAM. OR, M, R, Rp - The lbs Ammonia/day was based on the emission units potential to emit (worse case coating/maximum gallons per day usage). Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculation is in the testing section. ET- No stack test is required; emissions are based on MSDS and usage information.

3.26 TPY Ammonia	N	Y OAC rule 3745-31-05	N	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emissions unit. OR, M, R, Rp - The TPY Ammonia rate was based on the emission units potential to emit (maximum daily emission rate at 365 days/yr). Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculation is in the testing section. ET- No stack test is required; emissions are based on MSDS and usage information.
0.1 lb NOx/MMBtu 5.9 TPY NOx 0.084 lb CO/MMBtu 5.0 TPY CO 0.0006 lb SO2/MMBtu 0.04 TPY SO2 0.011 lb VOC/MMBtu 0.65 TPY VOC 0.0076 lb Particulate Emissions (PE)/PM10/MMBtu 0.45 TPY PE/PM10	N	Y OAC rule 3745-31-05	N	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. The emission limits listed are based on the natural gas fired drying oven for this emission unit. OR, M, R, Rp - Limits are based on the emission units potential to emit (maximum hourly gas usage at 8760 hours per year of operation) and AP-42 emissions factors. Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculations are listed in the testing section. ET- No stack test is required for uncontrolled EU
39.93 TPY VOC from coatings, based on a rolling, 12-month summation.	N	Y OAC rule 3745-31-05	N	Y	Y	Y	N	N	N	Y	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emissions unit and not subject to CAM. OR- Coating usage and VOC content limitations are specified in the permit and are based on permit application information. M/R - The monthly & rolling twelve month usage totals and emissions totals are collected and recorded. Rp - Quarterly deviation reports are required for TPY VOC emissions and material usage. Annual VOC emissions report and a 30-day notice of non-complying coatings are required. ET- No stack test is required; emissions are based on MSDS and usage information.	

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.	17-07(A)	N	N	N	N	N	N	N	N	N	N	N	Y	N	OR - Only natural gas is burned in this emission unit. It is an inherently clean fuel so there are no operational restrictions. M - If required, the VE evaluation methodology is spelled out in the testing section. R, Rp - Recordkeeping is associated with the VE evaluation methodology on an as needed basis, but not otherwise required to meet opacity restrictions. ET - No stack test is required; exceedances are based on Method 9 evaluations.
Forty percent VOC by volume of the coating and ink, excluding water and exempt solvents. Twenty-five percent VOC by volume of the volatile matter in the coating or ink.	21-09(Y)	N	N	Y	Y	N	N	Y	N	Y	N	Y	Y	N	OR - NA for VOC content restrictions M, R - The VOC content of all coatings is collected and recorded. Limits are based on permit application information The VOC content testing methodology is spelled out in the testing section. CAM is NA. Rp - A report for non-complying coatings is due within 30-days of the exceedance. ET- No stack test is required; compliance is based on MSDS information and recordkeeping.
10.72 percent VOC by weight. 4.6 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all coatings employed.	N	Y	OAC rule 3745-31-05	N	Y	Y	N	N	Y	N	Y	N	Y	N	All PTI requirements have been transferred. OR - NA for VOC content restrictions M, R - The VOC content of all coatings is collected and recorded. The VOC content testing methodology is spelled out in the testing section. CAM is NA. Rp - A report for non-complying coatings is due within 30-days of the exceedance. ET- No stack test is required; compliance is based on MSDS information and recordkeeping.
Total HAP emissions from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs	N	Y	40 CFR Part 63 Subpart KK.	N	N	Y	N	N	Y	N	Y	N	Y	N	This is an uncontrolled emissions unit. 40 CFR 63.820(a)(1) exempts non-major sources of Hazardous Air Pollutants (HAPs) from complying with the requirements of 40 CFR Part 63 Subpart KK, except for area sources, which must do minimal recordkeeping and reporting. M/R - Recordkeeping includes compliance with 40 CFR 63.829(d), and recording coating usage and HAP contents of materials used. The monthly and rolling 12-month emissions totals for individual and total HAPs is collected and recorded. Rp- Reporting per 40 CFR 63.830(b)(1) is required. Quarterly deviation reports for exceedances of the HAP rolling TPY limitations are required. ET - No stack test is required.

K002	425.73 lbs VOC/day	N	Y OAC rule 3745-31- 05	N	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emission unit. OR, M, R, Rp - The lbs VOC/day was based on the emission units potential to emit (worse case coating/maximum gallons per day usage). Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculation is in the testing section. ET- No stack test is required; Emissions are based on MSDS and usage information.
	14.93 lbs Ammonia/day	N	Y OAC rule 3745-31- 05	N	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emissions unit. OR, M, R, Rp - The lbs Ammonia/day was based on the emission units potential to emit (worse case coating/maximum gallons per day usage). Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculation is in the testing section. ET- No stack test is required; emissions are based on MSDS and usage information.
	2.73 TPY Ammonia	N	Y OAC rule 3745-31- 05	N	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emissions unit. OR, M, R, Rp - The TPY Ammonia rate was based on the emission units potential to emit (maximum daily emission rate at 365 days/yr). Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculation is in the testing section. ET- No stack test is required; emissions are based on MSDS and usage information.

0.1 lb NOx/MMBtu 5.7 TPY NOx 0.084 lb CO/MMBtu 4.8 TPY CO 0.0006 lb SO2/MMBtu 0.03 TPY SO2 0.011 lb VOC/MMBtu 0.63 TPY VOC 0.0076 lb Particulate Emissions (PE)/PM10/MMBtu 0.43 TPY PE/PM10	N	Y OAC rule 3745-31-05	N	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. The emission limits listed are those from the natural gas fired drying oven for this emission unit. OR, M, R, Rp - Limits are based on the emission units potential to emit (maximum hourly gas usage at 8760 hours per year of operation) and AP-42 emissions factors. Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculations are listed in the testing section. ET- No stack test is required for uncontrolled EU
33.34 TPY VOC from coatings, based on a rolling, 12-month summation.	N	Y OAC rule 3745-31-05	N	Y	Y	Y	N	N	N	Y	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emissions unit and not subject to CAM. OR- Coating usage and VOC content limitations are specified in the permit and are based on permit application information. M/R - The monthly & rolling twelve month usage totals and VOC emissions totals are collected and recorded. Rp - Quarterly deviation reports are required for TPY VOC emissions and material usage. An annual VOC emissions report and a 30-day notice of non-complying coatings are required. ET- No stack test is required; emissions are based on MSDS and usage information.	
Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.	17-07(A)	N	N	N	N	N	N	N	N	N	N	Y	N	OR - Only natural gas is burned in this emission unit. It is an inherently clean fuel so there are no operational restrictions. M - If required, the VE evaluation methodology is spelled out in the testing section. R/ Rp - Recordkeeping is associated with the VE evaluation methodology on an as needed basis. ET - No stack test is required; exceedances are based on Method 9 evaluations.	

	Forty percent VOC by volume of the coating and ink, excluding water and exempt solvents. Twenty-five percent VOC by volume of the volatile matter in the coating or ink.	21-09(Y)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - NA for VOC content restrictions M, R - The VOC content of all coatings is collected and recorded. Limits are based on permit application information The VOC content testing methodology is spelled out in the testing section. CAM is NA. Rp -A report for non-complying coatings is due within 30-days of the exceedance. CAM is NA. ET- No stack test is required; compliance is based on MSDS information and recordkeeping.
	10.72 percent VOC by weight. 4.6 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all coatings employed.	N	Y OAC rule 3745-31-05	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - NA for VOC content restrictions M/ R - The VOC content of all coatings is collected and recorded. Limits are based on permit application information The VOC content testing methodology is spelled out in the testing section. CAM is NA. Rp -A report for non-complying coatings is due within 30-days of the exceedance.. CAM is NA. ET- No stack test is required; compliance is based on MSDS information and recordkeeping.
	Total HAP emissions from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs	N	Y 40 CFR Part 63 Subpart KK.	N	N	Y	N	N	Y	N	Y	N	Y	N	This is an uncontrolled emissions unit. 40 CFR 63.820(a)(1) exempts non-major sources of Hazardous Air Pollutants (HAPs) from complying with the requirements of 40 CFR Part 63 Subpart KK, except for area sources, which must do minimal recordkeeping and reporting. M/R - Recordkeeping includes compliance with 40 CFR63.829(d), and recording coating usage and HAP contents of materials used. The monthly and rolling 12-month emissions totals for individual and total HAPs is collected and recorded. Rp- Reporting per 40 CFR63.830(b)(1) is required. Quarterly deviation reports for exceedances of the HAProlling TPY limitations are required. ET - No stack test is required.
K005	636.9 lbs VOC/day	N	Y OAC rule 3745-31-05	Y	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emission unit. OR, M, R, Rp - The lbs VOC/day was based on the emission units potential to emit (worse case coating/maximum gallons per day usage). Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculation is in the testing section. ET- No stack test is required; emissions are based on MSDS and usage information.

43 lbs Ammonia/day	N	Y OAC rule 3745-31-05	N	N	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emissions unit and not subject to CAM. OR, M, R, Rp - The lbs Ammonia/day was based on the emission units potential to emit (worse case coating/maximum gallons per day usage). Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculation is in the testing section. ET- No stack test is required; emissions are based on MSDS and usage information.
7.1 TPY Ammonia	N	Y OAC rule 3745-31-05	N	N	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. This is an uncontrolled emission unit and not subject to CAM. OR, M, R, Rp - The TPY Ammonia rate was based on the emission units potential to emit (maximum daily emission rate at 365 days/yr). Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculation is in the testing section. ET- No stack test is required; emissions are based on MSDS and usage information.
0.1 lb NOx/MMBtu 2.39 TPY NOx 0.084 lb CO/MMBtu 2.01 TPY CO 0.0006 lb SO2/MMBtu 0.01 TPY SO2 0.011 lb VOC/MMBtu 0.26 TPY VOC 0.0076 lb Particulate Emissions (PE)/PM10/MMBtu 0.18 TPY PE/PM10	N	Y OAC rule 3745-31-05	N	N	N	N	N	N	N	N	N	N	N	Y	N	All PTI requirements have been transferred. The emission limits listed are based on the natural gas fired drying oven for this emission unit. OR, M, R, Rp - Limits are based on the emission units potential to emit (maximum hourly gas usage at 8760 hours per year of operation) and AP-42 emissions factors. Therefore, operational restrictions, monitoring, recordkeeping, and reporting are not required. The potential to emit calculations are listed in the testing section. ET- No stack test is required for uncontrolled EU

	56.8 TPY VOC from coatings, based on a rolling, 12-month summation.	N	Y OAC rule 3745-31- 05	N	Y	Y	Y	N	N	N	Y	N	Y	N	<p>All PTI requirements have been transferred. This is an uncontrolled emissions unit and not subject to CAM.</p> <p>OR- Coating usage and VOC content limitations are specified in the permit and are based on permit application information.</p> <p>M/R - The monthly & rolling twelve month usage totals and VOC emissions totals are collected and recorded.</p> <p>Rp - Quarterly deviation reports are required for TPY VOC emissions and material usage. An annual VOC emissions report and a 30-day notice of non-complying coatings are required.</p> <p>ET- No stack test is required; emissions are based on MSDS and usage information.</p>
	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.	17-07(A)	N	N	N	N	N	N	N	N	N	N	Y	N	<p>OR - Only natural gas is burned in this emission unit. It is an inherently clean fuel so there are no operational restrictions.</p> <p>M - If required, the VE evaluation methodology is spelled out in the testing section.</p> <p>R/Rp - Recordkeeping and reporting is associated with the VE evaluation methodology on an as needed basis.</p> <p>ET - No stack test is required; exceedances are based on Method 9 evaluations.</p>
	<p>Forty percent VOC by volume of the coating and ink, excluding water and exempt solvents.</p> <p>Twenty-five percent VOC by volume of the volatile matter in the coating or ink.</p>	21-09(Y)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR - NA for VOC content restrictions</p> <p>M/R - The VOC content of all coatings is collected and recorded. Limits are based on permit application information The VOC content testing methodology is spelled out in the testing section.</p> <p>Rp -A report for non-complying coatings is due within 30-days of the exceedance.</p> <p>ET - No stack test is required; compliance is based on MSDS information and recordkeeping.</p>

<p>For inks, 11.18 percent VOC by weight.</p> <p>For inks, 8.0 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all coatings employed.</p> <p>For varnishes, 2.0 percent VOC by weight.</p> <p>For varnishes, 1.5 percent VOC as a weighted average, based upon a rolling, 12-month summation, of all coatings employed.</p>	N	Y OAC rule 3745-31-05	N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR - NA for VOC content restrictions</p> <p>M, R - The VOC content of all coatings is collected and recorded. Limits are based on permit application information The VOC content testing methodology is spelled out in the testing section.</p> <p>Rp -A report for non-complying coatings is due within 30-days of the exceedance.</p> <p>ET- not applicable for material VOC contents.</p>
<p>Total HAP emissions from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs</p>	N	Y 40 CFR Part 63 Subpart KK.	N	N	Y	N	N	Y	N	Y	N	Y	N	<p>This is an uncontrolled emissions unit. 40 CFR 63.820(a)(1) exempts non-major sources of Hazardous Air Pollutants (HAPs) from complying with the requirements of 40 CFR Part 63 Subpart KK, except for area sources, which must do minimal recordkeeping and reporting.</p> <p>M/R - Recordkeeping includes compliance with 40 CFR63.829(d), and recording coating usage and HAP contents of materials used. The monthly and rolling 12-month emissions totals for individual and total HAPs is collected and recorded.</p> <p>Rp- Reporting per 40 CFR63.830(b)(1) is required. Quarterly deviation reports for exceedances of the HAProlling TPY limitations are required.</p> <p>ET - No stack test is required.</p>

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

C Instructions for Part III:

- C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the

first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.