

Statement of Basis For Title V Permit

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| Company Name | Ivex Coated Products Co. | |
| Premise Number | 0855140077 | |
| Number of Non-insignificant Emissions Units | 9 | |
| What makes this facility a Title V facility? | volatile organic compounds and HAPs | |
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)? | yes | |

| Part II (State and Federally Enforceable Requirements) | | | |
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| Term and Condition (paragraph) | Basis | | Comments |
| | SIP (3745-) | Other | |
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Part III (Requirements Within the State & Federally Enforceable Section)

| EU(s) | Limitation | Basis | | OR | M | R | Rp | ET | Misc | Comments |
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| | | SIP (3745-) | Other | | | | | | | |
| K001, K003, K005 | less than 2.9 lbs VOC/gal on coating, excluding water and exempt solvents | 21-09 (F) | N | Y | Y | Y | Y | N | N | OR: The permittee is restricted to the use of coatings with a VOC content of less than or equal to 2.9 lbs VOC/gallon, excluding water and exempt solvents. M: The permittee shall monitor the VOC content of each coating material employed. R: The permittee shall maintain records of the VOC content of each coating employed. Rp: The permittee shall submit deviation reports when a coating with a VOC content greater than 2.9 lbs VOC/gallon, excluding water and exempt solvents is employed in this emissions unit. ET: No emissions testing is necessary to demonstrate compliance. Compliance is based on record keeping and USEPA Method 24. M: There are no miscellaneous requirements. |
| K001, K003, K005 | minimum 81% overall VOC reduction from the coating line and a minimum 90% destruction efficiency from the thermal incinerator | 21-09 (B)(6) | N | Y | Y | Y | Y | Y | N | OR: The permittee is restricted to a combustion chamber temperature in the thermal incinerator of not more than 50 degrees Fahrenheit below the average combustion chamber temperature during the most recent emissions test. M: The permittee shall continuously monitor the combustion chamber temperature in the thermal incinerator while the emissions unit is in operation. R: The permittee shall maintain a log of the operating time for the capture system, thermal incinerator, continuous emission monitor, and the coating line. The monitor shall also be capable of continuously recording the combustion chamber temperature in the thermal incinerator Rp: The permittee shall submit quarterly summaries of the records for the thermal incinerator and emissions unit. ET: The permittee shall test for organic compound capture and destruction efficiency by the thermal incinerator six months prior to renewal of this permit in accordance with OAC rule 3745-21-10 and 40 CFR Part 51, Appendix M, Methods 204 through 204F. M: There are no miscellaneous requirements. |

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| K002 | minimum 70% VOC capture from the coating line and a minimum 90% removal efficiency from the carbon adsorption system | 21-09 (Y)(1)(b) | N | Y | Y | Y | Y | Y | N | <p>OR: The permittee is restricted to a VOC concentration in the exhaust gases from the carbon adsorber not greater than 20% above the average concentration during the most recent emissions test.</p> <p>M: The permittee shall continuously monitor the VOC concentration in the exhaust gases from the carbon adsorber while the emissions unit is in operation.</p> <p>R: The permittee shall maintain a log of the operating time for the capture system, carbon adsorber, continuous emission monitor, and the coating line. The monitor shall also be capable of continuously recording the VOC concentration in the exhaust gases.</p> <p>Rp: The permittee shall submit quarterly summaries of the records for the carbon adsorber and emissions unit.</p> <p>ET: The permittee shall test for organic compound capture and removal efficiency by the carbon adsorber six months prior to renewal of this permit in accordance with OAC rule 3745-21-10 and 40 CFR Part 51, Appendix M, Methods 204 through 204F.</p> <p>M: There are no miscellaneous requirements.</p> |
| K002 and K004 | 40% VOC by volume of the coating and ink, excluding water; or 25% VOC by volume of the volatile matter in the coating and ink, employed on the printing station | 21-09 (Y)(1)(a) | N | Y | Y | Y | Y | N | N | <p>OR: The permittee is restricted to the use of coatings and inks on the print station with less than 40% VOC by volume of the coating and/or ink, excluding water, or to 25% VOC by volume of the volatile matter, excluding water.</p> <p>M: The permittee shall monitor the VOC content of the inks employed on the printing station.</p> <p>R: The permittee shall maintain records of the VOC content of the inks employed, in percent by volume of the ink, and in percent by volume of the volatile matter in the ink.</p> <p>Rp: The permittee shall submit records that identify any exceedances of the VOC content limitations for the ink.</p> <p>ET: No emissions testing is necessary to demonstrate compliance with this emissions limit. Compliance shall be based upon record keeping and USEPA Method 24 and 24A.</p> <p>M: There are no miscellaneous requirements.</p> |
| K004 | 400 kg organic HAP employed per month | N/A | 40 CFR Part 63 Subpart KK | Y | Y | Y | Y | N | N | <p>OR: The permittee is restricted to the use of a maximum of 400 kg organic HAP each month on product and packaging rotogravure or wide web flexographic printing presses on this emissions unit.</p> <p>M: The permittee shall monitor the total volume of each material and the organic HAP content of each material employed in this emissions unit on product and packaging rotogravure or wide web flexographic printing presses.</p> <p>R: The permittee shall maintain monthly records of the total volume and organic HAP content of each material employed.</p> <p>Rp: The permittee shall submit quarterly deviation reports which identify any exceedances of the monthly organic HAP usage.</p> <p>ET: No emissions testing is necessary to demonstrate compliance with this emissions limit. Compliance shall be based upon record keeping.</p> <p>M: There are no miscellaneous requirements.</p> |

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| K005 | 2750 lbs VOC/day | 31-05 | PTI 08- 210 | Y | Y | Y | Y | N | N | <p>OR: The permittee is restricted to the use of complying coatings, or the parameter restrictions on the carbon adsorber and thermal incinerator.</p> <p>M: The permittee shall monitor the operating parameters on the carbon adsorber and thermal incinerator. The permittee shall also monitor the amount and VOC contents of the coatings employed.</p> <p>R: The permittee shall maintain records of the coating usage and VOC content, as well as whether emissions are controlled or uncontrolled, for the purpose of calculating daily VOC emissions.</p> <p>Rp: The permittee shall submit quarterly deviation reports which identify any exceedances of the daily VOC emission limitation.</p> <p>ET: No emission testing is necessary to demonstrate compliance with this emissions limit. Compliance shall be based upon record keeping and USEPA Methods 24 and 24A.</p> <p>M: There are no miscellaneous requirements.</p> |
| K007 | less than or equal to 1.0 lb VOC/gal of coating, excluding water and exempt solvents, OR less than or equal to 1.0 lb VOC/gal, excluding water and exempt solvents after control | N | 40 CFR Part 51, App. S and PTI 08- 1416 | Y | Y | Y | Y | Y | N | <p>OR: The permittee is restricted to the use of coatings with a VOC content of less than or equal to 1.0 lb VOC/gallon, excluding water and exempt solvents, either before or after control.</p> <p>M: The permittee shall monitor the VOC content of the coatings employed as well as the control efficiency of the carbon adsorber or thermal incinerator.</p> <p>R: The permittee shall maintain records of the VOC content of the coatings employed.</p> <p>Rp: The permittee shall submit deviation reports which identify any exceedances of the VOC content limitation.</p> <p>ET: Emissions testing shall be performed to demonstrate the control efficiencies of the carbon adsorber and thermal incinerator. Compliance with this emission limit shall be based upon record keeping and USEPA Methods 24 and 24A.</p> <p>M: There are no miscellaneous requirements.</p> |
| K007 | 72.2 lbs/hour volatile organic compounds | N | 40 CFR Part 51, App. S and PTI 08- 1416 | Y | Y | Y | Y | Y | N | <p>OR: The permittee is restricted to the operational parameters for the carbon adsorber and thermal incinerator as determined during the most recent emission test that demonstrated compliance.</p> <p>M: The permittee shall continuously monitor the operational parameters for the carbon adsorber and thermal incinerator.</p> <p>R: The permittee shall continuously record the operational parameters for the carbon adsorber and thermal incinerator and shall maintain records of the operating times for the emissions unit, control devices, capture system, and monitors.</p> <p>Rp: The permittee shall submit quarterly summaries of the record keeping requirements.</p> <p>ET: Emissions testing shall be performed to demonstrate compliance with the hourly emission limitation.</p> <p>M: There are no miscellaneous requirements.</p> |

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| K007 | minimum 86% overall VOC reduction from the coating line and a minimum 97% destruction efficiency from the thermal incinerator | N | OAC rule 3745-31-05 and PTI 08-1416 | Y | Y | Y | Y | Y | N | OR: The permittee is restricted to a combustion chamber temperature in the thermal incinerator of not more than 50 degrees Fahrenheit below the average combustion chamber temperature during the most recent emissions test. M: The permittee shall continuously monitor the combustion chamber temperature in the thermal incinerator while the emissions unit is in operation. R: The permittee shall maintain a log of the operating time for the capture system, thermal incinerator, continuous emission monitor, and the coating line. The monitor shall also be capable of continuously recording the combustion chamber temperature in the thermal incinerator Rp: The permittee shall submit quarterly summaries of the records for the thermal incinerator and emissions unit. ET: The permittee shall test for organic compound capture and destruction efficiency by the thermal incinerator six months prior to renewal of this permit in accordance with OAC rule 3745-21-10 and 40 CFR Part 51, Appendix M, Methods 204 through 204F. M: There are no miscellaneous requirements. |
| K007 | less stringent than PTI limitation | OAC rule 3745-21-09(F) | | N | N | N | N | N | N | This limitation is less stringent than the federally enforceable limitations in the PTI which are based on BACT |
| P002 | 2.39 lbs/hour particulate matter | 17-11 (B)(1) | N | Y | Y | Y | Y | N | N | OR: The permittee shall maintain a pressure drop on the baghouse within the specified range, in inches of water. M: The permittee shall monitor the pressure drop on the baghouse on a daily basis. R: The permittee shall record the pressure drop of the baghouse daily. Rp: The permittee shall submit deviation reports which identify each day when the baghouse pressure drop was outside of the specified operating range. ET: No emissions testing is necessary to demonstrate compliance. Compliance shall be based upon monitoring of the baghouse pressure drop. M: There are no miscellaneous requirements. |
| P002, P011, and P013 | 8 lbs/hour and 40 lbs/day organic compounds | 21-07 (G)(2) | N | N | Y | Y | Y | N | N | OR: No operational restrictions are necessary to demonstrate compliance. CAM is not currently applicable. Compliance shall be based upon record keeping. M: The permittee shall monitor the amount of coating mixed. R: The permittee shall record the amount of coating mixed each day and the total organic compound emission rate from the process for each day. Rp: The permittee shall submit quarterly deviation reports which identify any exceedances of the organic compound emission rate. ET: No emissions testing is necessary to demonstrate compliance. Compliance shall be based upon record keeping. M: There are no miscellaneous requirements. |

EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

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

Misc = miscellaneous requirements