



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

07/31/00

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

01-25-04-1602
SIG Combibloc, Inc.
Robert F Schwarz
4800 Roberts Road
Columbus, OH 43228-9699

Dear Robert F Schwarz:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 06/11/98. The comment period has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written or with agreed-upon changes, then you have the opportunity to schedule a meeting with us to discuss your concerns.

Please contact Jim Orlemann, Engineering Section Manager, 614-644-3592, or you can telefax your request to (614) 644-3681, within fourteen (14) days from receipt of this letter if a meeting is desired. If a request for a meeting is not received within fourteen (14) days of receipt of this letter, we will forward this proposed permit (as written, or with agreed-upon changes) to USEPA for approval.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Central District Office
Becky Castle, DAPC PMU



Ohio EPA
State of Ohio Environmental Protection Agency

TITLE V PERMIT

Date: 07/31/00

PRELIMINARY PROPOSED

Effective Date:

Expiration Date:

This document constitutes issuance to:

SIG Combibloc, Inc.
4800 Roberts Road
Columbus, OH 43228-9699

of a Title V permit for Facility ID: 01-25-04-1602

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:

K001 (Rotogravure Press #1)
Rotogravure Press Used for Printing on Aseptic Packaging Stock

K002 (Extruder / Laminator)
Polyethylene Extruder and Laminator for Constructing Aseptic Packaging Laminate

K003 (Rotogravure Press #2)
Rotogravure Press Used for Printing on Aseptic Packaging Stock

L001 (Large Renzman)
Large Renzman Parts Cleaner Used For Cleaning of Print Rolls With Ethanol

L002 (Small Renzman)
Small Renzman Parts Cleaner Used For Cleaning of Print Rolls With Ethanol

P002 (Ink Mixing/Storage)
Ink Mixing and Storage Room

P003 (Trim System)
Shredder / Baler / Pneumatic Conveying System for Laminate Trim

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or

revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that

inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted

to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
- ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

T001- 10,000 gallon ethyl alcohol storage tank; and
Z001- 16 gas-fired space heaters and 7 gas-fired air handlers.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rotogravure Press #1 (K001)

Activity Description: Rotogravure Press Used for Printing on Aseptic Packaging Stock

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
rotogravure press #1 (Blue Press) controlled with a catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI# 01-6772)	Volatile organic compound (VOC) emissions shall not exceed 12 lbs/hr and 55 tons/yr. See A.I.2.a. below.
	OAC rule 3745-21-09(Y)(1)(b)	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 permittee shall control VOC emissions from this emissions unit through the use of a Permanent Total Enclosure and a catalytic incinerator with a minimum overall control efficiency of 90%.

II. Operational Restrictions

- The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80% of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
- The Permanent Total Enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80% of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The name and identification of each cleanup material employed.
 - e. The number of gallons of each cleanup material employed.
 - f. The VOC content of each cleanup material, in pounds per gallon.
 - g. The total number of hours the emissions unit was in operation during the calendar month.
 - h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds per month (i.e., the sum of (b)x(c) for all coatings + the sum of (e)x(f) for all cleanup materials)
 - i. The, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. (The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - j. The average hourly controlled VOC emission rate, in pounds per hour (i.e., i/g).
 3. The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80% of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in Section A.II.2 of this permit.

The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

- 1.a Emission Limitations:
Use of a Permanent Total Enclosure and a minimum overall control efficiency of 90%, by weight, for the VOC emissions.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate compliance with the minimum overall control efficiency requirement of Section A.I. in accordance with the following requirements:

- i. The emission testing shall be conducted approximately 1.5 years after permit issuance and within 6 months prior to permit renewal.
- ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.
- iii. The test(s) shall be conducted while this emissions unit and K001 are venting VOC emissions to the catalytic incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

- 1.b** The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section A.V.1.a.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- 1.c** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- 2.** Emission Limitation: 12 lbs of VOC/hr

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping in Section A.III.2 and the results of the emissions testing required by Section A.V.1 of this permit.

- 3.** Emission Limitation:
55 tons of VOC/yr

Applicable Compliance Method:

Compliance shall be determined as the sum of the monthly, controlled VOC emission rates for all coatings and clean up materials for the calendar year.

- 4.** USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

- 5.** USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
rotogravure press #1 (Blue Press) controlled with a catalytic incinerator	None	None

2. **Additional Terms and Conditions**

- 2.a. **None**

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Extruder / Laminator (K002)

Activity Description: Polyethylene Extruder and Laminator for Constructing Aseptic Packaging Laminate

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
extruder/laminator EX-1 process (which includes Laminators #1, #2 and #3)	OAC rule 3745-31-05(A)(3) (PTI# 01-4565)	Organic compound (OC) emissions shall not exceed 2.9 lbs/hr.
	OAC rule 3745-17-07(A)	See A.I.2.b-d and A.II.2 below. Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-07(G)	See A.I.2.a. below.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.

2. Additional Terms and Conditions

- 2.a Pursuant to OAC rule 3745-21-07(G)(9), this emissions unit shall not employ any photochemically reactive materials.
- 2.b Nitrogen oxides (NOx) emissions shall not exceed 4 lbs/hr.
- 2.c Ozone (O3) emissions shall not exceed 0.007 lb/hr.
- 2.d The hourly emission limitation was established to reflect the potential to emit for K002. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. 100% solids material shall be employed by the permittee in the lamination process.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each coating and cleanup material employed.
 - b. Documentation of whether each coating and cleanup material is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any daily record showing that a photochemically reactive material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 30 days after the photochemically reactive material was employed.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

- 1.b Emission Limitation:
20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

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).

- 1.c Emission Limitation:
2.9 lbs of OC/hr

Applicable Compliance Method:

Use the emission factor established during emissions testing performed on November 18, 1992 (0.25 lb of OC/1000 pounds of polyethylene) and maximum polyethylene process weight rates of 584 lbs/hr, 778 lbs/hr and 2,139 lbs/hr for laminators #1, #2 and #3, respectively.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A.

- 1.d Emission Limitation:
4 lbs of NOx/hr

Applicable Compliance Method:

Use the emission factor established during emissions testing performed on November 18, 1992 (100 lbs of NOx/million cubic feet natural gas consumed) and a maximum heat input of 1.5 mmBtu/hr for each of the two Flynn burners.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 7.

V. Testing Requirements (continued)

1.e Emission Limitation:
0.007 lb of O₃/hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the wet chemistry (potassium/iodide) method employed during the emission testing performed on November 18, 1992.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
extruder/laminator EX-1 process (which includes Laminators #1, #2 and #3)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rotogravure Press #2 (K003)

Activity Description: Rotogravure Press Used for Printing on Aseptic Packaging Stock

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
rotogravure press #2 (White Press) controlled with a catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI# 01-6772)	Volatile organic compound (VOC) emissions shall not exceed 17.4 lbs/hr and 76 tons/yr. See A.I.2.a. below.
	OAC rule 3745-21-09(Y)(1)(b)	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 permittee shall control VOC emissions from this emissions unit through the use of a Permanent Total Enclosure and a catalytic incinerator with a minimum overall control efficiency of 90%.

II. Operational Restrictions

- The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80% of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
- The Permanent Total Enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80% of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating, as applied, in pounds per gallon.
 - c. The number of gallons of each coating employed.
 - d. The name and identification of each cleanup material employed.
 - e. The number of gallons of each cleanup material employed.
 - f. The VOC content of each cleanup material, in pounds per gallon.
 - g. The total number of hours the emissions unit was in operation during the calendar month.
 - h. The total uncontrolled VOC emission rate from all coatings and cleanup materials, in pounds per month (i.e., the sum of (b)x(c) for all coatings + the sum of (e)x(f) for all cleanup materials)
 - i. The controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. (The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
 - j. The average hourly controlled VOC emission rate, in pounds per hour (i.e., i/g).
 3. The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
 - c. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80% of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in Section A.II.2.

The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

- 1.a Emission Limitations:
Use of a Permanent Total Enclosure and a minimum overall control efficiency of 90%, by weight, for the VOC emissions.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to demonstrate compliance with the minimum overall control efficiency requirement of Section A.I. in accordance with the following requirements:

- i. The emission testing shall be conducted approximately 1.5 years after permit issuance and within 6 months prior to permit renewal.
- ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.
- iii. The test(s) shall be conducted while this emissions unit and K001 are venting VOC emissions to the catalytic incinerator. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

V. Testing Requirements (continued)

1.b The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in A.V.1.a.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

1.c Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

2. Emission Limitation:
17.4 lbs of VOC/hr

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping required by Section A.III.2 and the emissions testing required by Section A.V.1 of this permit.

3. Emission Limitation:
76 tons of VOC/yr

Applicable Compliance Method:

Compliance shall be determined as the sum of the monthly, controlled VOC emission rates for all coatings and clean up materials for the calendar year.

4. USEPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the VOC contents of the coatings.

5. USEPA Method 24 (40 CFR Part 60, Appendix A) or formulation data shall be used to determine the VOC contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
rotogravure press #2 (White Press) controlled with a catalytic incinerator	None	None

2. **Additional Terms and Conditions**

- 2.a. **None**

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Large Renzman (L001)

Activity Description: Large Renzman Parts Cleaner Used For Cleaning of Print Rolls With Ethanol

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
large Renzman parts cleaner	OAC rule 3745-31-05(A)(3) (PTI# 01-7466)	Organic compound (OC) emissions shall not exceed 17 pounds per hour and 50 tons per year.
	OAC rule 3745-21-09(O)	See A.II. below.

2. Additional Terms and Conditions

- 2.a For this permit, "idle" is defined as the time period, in hours, during which no parts are being cleaned in L001.
- 2.b For this permit, "operating hours" is defined as the time period, in hours, during which parts are being cleaned in L001.
- 2.c The requirements of 40 CFR Part 63, Subpart T do not apply to this emissions unit because the solvent used (ethanol) is not a halogenated Hazardous Air Pollutant (HAP) as identified in 40 CFR Part 63.460.
- 2.d The hourly emission limitation was established to reflect the potential to emit for L001. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

1. The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
2. A freeboard ratio of greater than or equal to 0.7 shall be maintained.

II. Operational Restrictions (continued)

3. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
 - f. Clean only materials that are neither porous nor absorbent.
4. The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.
5. The maximum annual operating hours for L001 shall not exceed 3,504 hours.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The types of solvents employed in the cold cleaner.
 - b. The vapor pressure of each solvent, in pound per square foot absolute, measured at 100 degrees Fahrenheit.
2. The permittee shall maintain monthly records of the following information for purposes of determining annual emissions:
 - a. The total operating hours for the cold cleaner.
 - b. The total number of hours during which the cold cleaner is idle.
 - c. The total OC emissions, in pounds.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

- 1.a Emission Limitation:
17 lbs of OC/hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

V. Testing Requirements (continued)

1.b Emission Limitation:
50 tons of OC/yr

Applicable Compliance Method:

Compliance shall be calculated as the sum of the monthly OC emissions (Section A.III.2.c) for the calendar year. Monthly OC emissions shall be calculated as follows:

$$\text{lbs OC/month} = (\text{A.III.2.a}) \times (17 \text{ lbsOC/hr}^*) + (\text{A.III.2.b}) \times (7.72 \text{ lbs/hr}^*)$$

*The most recent emissions test was conducted in 1997 from which an emission factor of 17 lbs OC/hr was obtained while L001 was in operation and an emission factor of 7.72 lbs OC/hr was obtained while L001 was idle.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
large Renzman parts cleaner	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Small Renzman (L002)

Activity Description: Small Renzman Parts Cleaner Used For Cleaning of Print Rolls With Ethanol

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
small Renzman parts cleaner	OAC rule 3745-31-05(A)(3) (PTI# 01-6433)	Organic compound (OC) emissions shall not exceed 4 lbs/hr and 17.5 tons/yr.
	OAC rule 3745-21-09(O)	See A.II. below.

2. Additional Terms and Conditions

- 2.a For this permit, "idle" is defined as the time period, in hours, during which no parts are being cleaned in L002.
- 2.b For this permit, "operating hours" is defined as the time period, in hours, during which parts are being cleaned in L002.
- 2.c The requirements of 40 CFR Part 63, Subpart T do not apply to this emissions unit because the solvent used (ethanol) is not a halogenated Hazardous Air Pollutant (HAP) as identified in 40 CFR Part 63.460.
- 2.d The hourly emission limitation was established to reflect the potential to emit for L002. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

1. The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
2. A freeboard ratio of greater than or equal to 0.7 shall be maintained.

II. Operational Restrictions (continued)

3. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
 - f. Clean only materials that are neither porous nor absorbent.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
 - a. The types of solvents employed in the cold cleaner.
 - b. The vapor pressure of each solvent, in pound per square foot absolute, measured at 100 degrees Fahrenheit.
2. The permittee shall maintain monthly records of the following information for purposes of determining annual emissions:
 - a. The total operating hours for the cold cleaner.
 - b. The total number of hours during which the cold cleaner is idle.
 - c. The total OC emissions, in pounds.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the allowable hourly OC emission rate.

The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
4 lbs of OC/hr

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

V. Testing Requirements (continued)

1.b Emission Limitation:
17.5 tons of OC/yr

Applicable Compliance Method:

Compliance shall be calculated as the sum of the monthly OC emissions (Section A.III.2.c) for the calendar year. Monthly OC emissions shall be calculated as follows:

$$\text{lbs OC/month} = (\text{A.III.2.a}) \times (4 \text{ lbsOC/hr}^*) + (\text{A.III.2.b}) \times (1.6 \text{ lbs/hr}^*)$$

*The most recent emissions test was conducted in 1997 from which an emission factor of 4 lbs OC/hr was obtained while L002 was in operation and an emission factor of 1.6 lbs OC/hr was obtained while L002 was idle.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
small Renzman parts cleaner	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ink Mixing/Storage (P002)
Activity Description: Ink Mixing and Storage Room

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
ink mixing/storage	OAC rule 3745-31-05(A)(3) (PTI# 01-6433)	Organic compound (OC) emissions shall not exceed 6 lbs/hr and 26 tons/yr.
	OAC rule 3745-21-07(G)	See A.I.2.a. below.

2. Additional Terms and Conditions

- 2.a. Pursuant to OAC rule 3745-21-07(G)(9), the permittee shall not employ any photochemically reactive materials in this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the ink/solvent mixing operation:
 - a. The company identification for each solvent and cleanup material employed.
 - b. Documentation of whether each solvent and cleanup material is a photochemically reactive material.
 - c. The organic compound (OC) content of each solvent and cleanup material, in pounds per gallon.
 - d. The total OC emission rate* for all solvents and cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all solvent and cleanup materials.

* The total OC emissions from this emissions unit shall be determined using the following formula:

Total OC = $1.8x(b) + 5.5x(a)$ where (a) equals the number of hours the emissions unit was engaged in the activity of mixing ink (Section A.III.1.e of this permit) and (b) equals the number of hours during which the emissions unit was not engaged in the activity of mixing ink (i.e., 24 hours minus the number of hours from Section A.III.1.e of this permit)

Note: This formula is based upon in-house emissions testing conducted in 1995 using USEPA testing methodology (40 CFR Part 60, Appendix A, Method 25A).

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Central District Office) in writing of any daily record showing that a photochemically reactive material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Central District Office) within 30 days after the photochemically reactive material was employed.
2. The permittee shall submit deviation (excursion) reports which identify each day during which the average hourly OC emission rate exceeded 6 lbs/hr, and the actual average hourly OC emission rate for each such day.

The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

- 1.a Emission Limitation:
6 lbs of OC/hr

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping in Section A.III.1.f of this permit.

- 1.b Emission Limitation:
26 tons of OC/yr

Applicable Compliance Method:

Compliance shall be demonstrated as the sum of the total daily OC emissions for all solvents and cleanup materials for the calendar year.

Facility Name: **Combibloc, Inc.**
Facility ID: **01-25-04-1602**
Emissions Unit: **Ink Mixing/Storage (P002)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
ink mixing/storage	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Trim System (P003)

Activity Description: Shredder / Baler / Pneumatic Conveying System for Laminate Trim

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
trim system controlled with a baghouse	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 2.91 lbs/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-31-05(A)(3) (PTI# 01-6433)	Particulate emissions shall not exceed 12.75 tons/yr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on daily basis.
- The permittee shall maintain monthly records of the total number of hours the emissions unit was in operation.

IV. Reporting Requirements

- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- The permittee shall submit annual reports which specify the total particulate emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

1.a. Emission Limitation:
Particulate emissions shall not exceed 2.91 lbs/hr.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emissions testing for this emissions unit to demonstrate compliance with the 2.91 lbs/hr of particulate emission limitation in accordance with the following requirements:

i. The emission testing shall be conducted within 3 months after issuance of this permit and 6 months prior to permit renewal.

ii. The following test method(s) shall be employed to determine the controlled mass rate of particulate emissions from this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 5.

iii. The test(s) shall be conducted while this emissions unit is operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

1.b. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

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

Applicable Compliance Method:

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

3.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
trim system controlled with a baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Facility Name: **Combibloc, Inc.**
Facility ID: **01-25-04-1602**

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