



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

3/18/2011

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

BILLIE BROWN
International Paper Food Service
1300 S MAIN ST
KENTON, OH 43326

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0333010035
Permit Number: P0106238
Permit Type: OAC Chapter 3745-31 Modification
County: Hardin

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Kenton Times. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NWDO; Indiana



Permit Strategy Write-Up

1. Check all that apply:

[x] Synthetic Minor Determination

[] Netting Determination

2. Source Description:

International Paper Food Service Business produces printed paper cups, primarily for use in vending machines and general consumer uses. The paperboard used to make the paper cups and other foodservice containers is purchased on rolls and is printed off-line using flexographic printing presses. The facility is requesting federally enforceable limits on VOC and combined HAP emissions to provide regulatory certainty regarding the facility's potential to emit.

3. Facility Emissions and Attainment Status:

International Paper Food Service Business is located in Hardin County and is classified as a minor facility for Title V purposes. Hardin County is designated attainment for all criteria pollutants.

4. Source Emissions:

International Paper has requested a synthetic minor to ensure that emissions of VOC and combined HAPs are federally enforceable. This will provide the facility with regulatory certainty that VOC and combined HAP emissions remain below the significance thresholds.

5. Conclusion:

As part of the company's strategy to ensure Title V permitting requirements do not apply, federally enforceable limits will be imposed on VOC and combined HAP emissions to ensure the potential emissions remain below the Title V significance thresholds.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Table with 2 columns: Pollutant, Tons Per Year. Rows: VOC (83.94), Combined HAPs (9.38)

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
International Paper Food Service

Issue Date: 3/18/2011
Permit Number: P0106238
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Modification of four existing printing presses to incorporate federally enforceable restrictions on the potential to emit and to align the terms and conditions.
Facility ID: 0333010035
Facility Location: International Paper Food Service
1300 South Main Street,
Kenton, OH 43326
Facility Description: Nonfolding Sanitary Food Container Manufacturing

Scott J. Nally, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Andrea Moore at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 or (419)352-8461. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
International Paper Food Service**

Facility ID:	0333010035
Permit Number:	P0106238
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	3/18/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
International Paper Food Service

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Authorization

Facility ID: 0333010035
Application Number(s): A0039387
Permit Number: P0106238
Permit Description: Modification of four existing printing presses to incorporate federally enforceable restrictions on the potential to emit and to align the terms and conditions.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/18/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

International Paper Food Service
1300 South Main Street
Kenton, OH 43326

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0106238

Permit Description: Modification of four existing printing presses to incorporate federally enforceable restrictions on the potential to emit and to align the terms and conditions.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Presses

Emissions Unit ID:	K003
Company Equipment ID:	Webtron Flexographic Printing Press
Superseded Permit Number:	03-8744
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	K005
Superseded Permit Number:	03-13684
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	K006
Superseded Permit Number:	03-13871
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K007
Company Equipment ID:	Flexographic Press
Superseded Permit Number:	P0103732
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

Draft Permit-to-Install and Operate

International Paper Food Service

Permit Number: P0106238

Facility ID: 0333010035

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Presses: K003, K005, K006, K007,

EU ID	Operations, Property and/or Equipment Description
K003	Webtron Flexographic Printing Press with Natural Gas-Fired Drying Oven
K005	Comco Flexographic Printing Press with Electric Drying Oven
K006	Faustel Gravure Coater (Rotogravure Printing Line) with Natural Gas-Fired Oven
K007	Flexographic Printing Press with Integral Natural Gas-Fired Drying Section

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. c)(1) and d)(6)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. (2)c., b)(1)b., b)(2)e., d)(2), d)(3), e)(3), f)(1)b., and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)	<u>Emissions Unit K003</u> 1855.00 lbs of volatile organic compounds (VOC)* /month <u>Emissions Unit K005</u> 4045.00 lbs of VOC* /month <u>Emissions Unit K006</u> 4108.00 lbs of VOC* /month <u>Emissions Unit K007</u> 3957.00 lbs of VOC* /month See b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(D)	Emissions of VOC shall not exceed 83.94 tons per rolling, 12-month period, from the printing and cleanup operations* associated with emissions units K003,

Draft Permit-to-Install and Operate

International Paper Food Service

Permit Number: P0106238

Facility ID: 0333010035

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		K005, K006, and K007 combined (see b)(2)e.) Emissions of combined hazardous air pollutants (HAPs) shall not exceed 9.38 tons per rolling, 12-month period, from the printing and cleanup operations* associated with emissions units K003, K005, K006, and K007 combined (see b)(2)e.)
c.	OAC rule 3745-21-09(Y)(1)(a)	See b)(2)a.
d.	OAC rule 3745-21-09(F)(1)	2.90 lbs of VOC per gallon of coating, excluding water and exempt solvents

* Including inks, pH additives, defoamers, print clean, ammonia reducer, alcohol, cleanup solvents, etc.

(2) Additional Terms and Conditions

- a. The VOC content of coatings and inks employed shall not exceed the following limitation:
 - i. Forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - ii. Twenty-five percent VOC by volume of the volatile matter in the coating and ink.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a).
- c. Best Available Technology (BAT) control requirements for each emissions unit has been determined to be use of compliant coatings and inks.
- d. Combustion emissions generated from the natural gas-fired drying ovens associated with emissions units K003, K006, and K007 are negligible and not included in this permit. Therefore, these emissions units are not subject to the requirements of OAC rule 3745-31-05(A)(3), as effective 11/30/01 and 12/01/06. (Note: the oven associated with emissions unit K005 is electric.)
- e. This permit establishes federally enforceable limitations for emissions of VOC and for emissions of combined HAPs for the purpose of providing regulatory certainty regarding the facility's potential to emit.

Combined annual VOC emissions from emissions units K003, K005, K006, and K007 shall not exceed 83.94 tons per rolling, 12-month period.

Combined annual HAPs emissions from emissions units K003, K005, K006, and K007 shall not exceed 9.38 tons per rolling, 12-month period. For purposes of

Draft Permit-to-Install and Operate

International Paper Food Service

Permit Number: P0106238

Facility ID: 0333010035

Effective Date: To be entered upon final issuance

federal enforceability, an emission restriction on combined HAPs effectively limits emissions of individual HAPs since emissions from combined HAPs are less than 10 tons per year.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the VOC and HAP emission rates specified in the following table:

Maximum Allowable Cumulative VOC and HAP Emission Rates (tons):

<u>Month(s)</u>	<u>VOC Emissions</u>	<u>Combined HAPs</u>
1 - 1	16.75	1.88
1 - 2	22.85	2.56
1 - 3	28.95	3.24
1 - 4	35.05	3.92
1 - 5	41.15	4.60
1 - 6	47.25	5.28
1 - 7	53.35	5.96
1 - 8	59.45	6.64
1 - 9	65.55	7.32
1 - 10	71.65	8.00
1 - 11	77.75	8.68
1 - 12	83.94	9.38

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC and HAP limitations shall be based upon a rolling, 12-month summation of the monthly emission rates.

c) Operational Restrictions

- (1) Prior to using any coating or ink in a printing press or printing line, the permittee shall evaluate the materials to determine if the chemical compounds in the coating or ink would be emitted at levels that would satisfy the "Toxic Air Contaminant Statute", ORC 3704.03(F) as determined by steps contained in c)(1)a. through c)(1)e. below:
 - a. From information regarding the composition and/or ingredients for each coating or ink to be used such as a Material Safety Data Sheet (MSDS), coating specification sheet, etc. identify the following:

Draft Permit-to-Install and Operate

International Paper Food Service

Permit Number: P0106238

Facility ID: 0333010035

Effective Date: To be entered upon final issuance

- i. any of the chemical compounds contained in the coating or ink that are listed as a toxic air contaminant in OAC rule 3745-114-01 (If a coating or ink does not a toxic air contaminant it will not be necessary to complete the remainder of the steps below to demonstrate compliance with the Toxic Air Contaminant Statute);
- ii. if a coating or ink contains a toxic air contaminant as identified in c)(1)a.i., the following information shall be determined:
 - (a) the density of the coating or ink, in pounds per gallon;
 - (b) the percent by weight (wt%) of each chemical compound indentified in c)(1)a.i. as contained in the coating or ink.
 - (c) for each toxic air contaminant indentified in c)(1)a.i., the threshold limit value (TLV), short term exposure limit (STEL), or ceiling value as established by the American Conference of Governmental Industrial Hygienists' (ACGIH), "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"
- b. Determine the Maximum Acceptable Ground-Level Concentration (MAGLC) for each chemical compound indentified in c)(1)a.i. The MAGLC shall be calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as summarized below:

MAGLC = TLV (ug/m³) divided by 42
- c. Determine the maximum coating or ink usage rate in terms of pounds per hour in accordance with the following:
 - i. determine the maximum coating or ink application rate in gallons per hour using the following factors:
 - (a) the maximum speed of the press or printing line based on the product being produced which will utilize the ink or coating being evaluated; and
 - (b) the coverage/laydown rate for the ink or coating being used on the product to be produced.
 - ii. multiply the density (lbs/gal) of the coating or ink by the coating usage rate (gal/hr) to determine the maximum coating usage rate in pounds per hour [c)(1)c.i times c)(1)c.ii].
- d. Determine the emission rate (in pounds per hour) for each toxic air contaminant indentified in c)(1)a.i. by multiplying the maximum coating or ink usage rate in pounds per hour by the wt% for each chemical compound indentified in c)(1)a.i. [c)(1)a.i.(b) times c)(1)c.ii].
- e. Perform modeling for each air contaminant indentified in c)(1)a.i. using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA

approved model. Compare the predicted 1-hour maximum ground-level concentration result from the approved air dispersion model to the associated MAGLC. If the predicted 1-hour maximum ground level concentration is less than 80% of the MAGLC, then the chemical compound is emitted at an acceptable rate and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than 80% of the MAGLC, contact the Northwest District Office to determine if the use the coating or ink is acceptable.

- (2) Prior to making any physical changes to a printing press or printing line that could impact the parameters or values that were used in determining an acceptable predicted 1-hour maximum ground-level concentration, the permittee shall re-model with the change(s) applied to demonstrate that the revised modeling results in acceptable rate(s) as indicated in c)(1)e. above. Changes that can affect the parameters/values used in determining the predicted 1-hour maximum ground-level concentration include, but are not limited to items such as physical changes such as increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each month for emissions units K003, K005, K006, and K007 on an individual basis:
 - a. The name and identification of each VOC-containing material employed (i.e., ink, pH additives, defoamers, print clean, ammonia reducer, alcohol, cleanup solvents, etc.);
 - b. The VOC content of each VOC-containing material, in pounds per gallon, as applied;
 - c. The number of gallons of each VOC-containing material employed;
 - d. The total VOC emissions from each VOC-containing material employed, in pounds (summation of (d)(1)b. x d)(1)c.); and
 - e. The total VOC emissions from all VOC-containing materials employed, in pounds (summation of d)(1)d.).
- (2) The permittee shall collect and record the following information each month for emissions units K003, K005, K006, and K007, combined:
 - a. For the first 12 months of operation following the issuance of this permit, the cumulative monthly VOC emissions, in tons; and
 - b. After the first 12 months of operation following the issuance of this permit, the rolling, 12-month VOC emissions, in tons.
- (3) The permittee shall collect and record the following information each month for emissions units K003, K005, K006, and K007, combined:

Draft Permit-to-Install and Operate

International Paper Food Service

Permit Number: P0106238

Facility ID: 0333010035

Effective Date: To be entered upon final issuance

- a. The name and identification of each HAP-containing printing and cleanup material employed (i.e., ink, pH additives, defoamers, print clean, ammonia reducer, alcohol, cleanup solvents, etc.);
 - b. The amount of HAP in each printing and cleanup material, in pounds per gallon, as applied;
 - c. The number of gallons of each printing and cleanup material employed;
 - d. The total HAP emissions from each printing and cleanup material employed, in pounds (summation of d)(2)b. x d)(2)c.);
 - e. The total HAP emission rate from all printing and cleanup materials employed, in pounds (summation of d)(2)d.);
 - f. For the first 12 months of operation following the issuance of this permit, the cumulative monthly HAP emissions, in tons (summation of d)(2)e. for all HAPs from all printing and cleanup materials); and
 - g. After the first 12 months of operation following the issuance of this permit, the rolling ,12-month HAP emissions, in tons.
- (4) The permittee shall collect and record the following information each month for purposes of demonstrating compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a):
- a. When complying with the VOC emission limitation specified in b)(2)a.i., the permittee shall collect and record the VOC content of each coating and ink in percent VOC by volume of the coating and ink, excluding water and exempt solvents, as applied* [calculated as in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,5}$];
 - b. When complying with the VOC emission limitation specified in b)(2)a.ii., the permittee shall collect and record the VOC content of each coating and ink in percent VOC by volume of the volatile matter in the coating and ink, as applied* [calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,6}$]
- *When the permittee employs a blend or mixture of compliant coatings, inks, additives, reducer, etc. [i.e. each individual coating, ink, additive, reducer, etc., used to make up the “as applied” material, complies with the appropriate VOC emission limitation in b)(2)a.i. or b)(2)a.ii.], the permittee may apply the recordkeeping requirements of this term and condition to the individual components of blend or mixture in lieu of the blend or mixture on an “as applied” basis.
- (5) The permittee shall collect and record the following information each month for purposes of demonstrating compliance with the requirements of OAC rule 3745-21-09(B)(3)(f):
- a. the name and identification number of each coating, as applied;

- b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied.

This information does not have to be kept on a line-by-line basis. Also, if an owner or operator mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute" as indicated in c)(1) and c)(2):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (change in stack/exhaust parameters, etc.);
 - b. the MAGLC for each toxic air contaminant, calculated in accordance with the "Toxic Air Contaminant Statute";
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s).

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncompliant coatings and/or inks. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:

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- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month VOC limitation of 83.76 tons; and
 - ii. the rolling, 12-month combined HAP limitation of 9.38 tons.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the emission limitations contained in section b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation
K003: 1855.00 lbs of VOC/month
K005: 4045.00 lbs of VOC/month
K006: 4108.00 lbs of VOC/month
K007: 3957.00 lbs of VOC/month

Applicable Compliance Method

Compliance with the monthly limitations shall be based upon the record keeping requirements in section d)(1).

- b. Emission Limitation
Emissions of VOC shall not exceed 83.94 tons per rolling, 12-month period from printing and cleanup operations associated with emissions units K003, K005, K006, and K007

Applicable Compliance Method

Compliance with the monthly and annual limitations shall be based upon the record keeping requirements in section d)(2).

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c. Emission Limitation

Emissions of combined HAPs shall not exceed 9.38 tons per rolling, 12-month period from printing and cleanup operations associated with emissions units K003, K005, K006, and K007

Applicable Compliance Method

Compliance with the monthly and annual limitations shall be based upon the recordkeeping requirements in section d)(3).

d. Emission Limitation

2.90 lbs of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

The permittee shall demonstrate compliance with the VOC content limitation based on the record keeping requirements in d).

Formulation data or U.S. EPA Method 24A shall be used to determine the VOC contents of the coatings.

e. Emission Limitation

VOC content of each coating and ink shall not exceed:

- i. Forty percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
- ii. Twenty-five percent VOC by volume of the volatile matter in the coating and ink.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in section d)(2). Formulation data or U.S. EPA Method 24A shall be used to determine the VOC contents of the coatings and inks.

g) Miscellaneous Requirements

- (1) None