



**Environmental
Protection Agency**

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

October 20, 2011

Mr. Andrew Mark
Primary Packaging Inc.
10810 Industrial Parkway
Bolivar, OH 44612

Re: Tuscarawas County
Primary Packaging Inc.; Facility ID # 0679000276
Application No. A0042064 received on 10/13/2011
Return of Application and Warning Letter

Dear Mr. Mark:

This letter is to inform you that this office received your application for an OAC Chapter 3745-31 modification and renewal of Federally Enforceable Permits-to-Install and Operate (FEPTIOs) for emissions units (EUs) K001, K004 and K005, and that I have been assigned to process your application, which includes a preliminary completeness review. The purpose of this review is to identify basic deficiencies early in the permit process, and allow you to make corrections. Our review found that the application you submitted is not complete and cannot be processed at this time.

The following additional information or corrections are needed in order to make your application complete:

- 1) No MSDSs were provided for the inks or cleanup solvent(s) used, and no HAP or particulate information was provided or addressed.
- 2) The process flow diagram provided does not identify the number of drying ovens identified in the EAC forms.
- 3) No fuel input ratings for any of the natural gas-fired drying/curing ovens were provided.
- 4) The cleanup solvent information presented in the EAC forms does not correspond to the information presented in the emissions calculations. At the hourly use rate indicated, the annual use rate on which the PTE calculations were based would be 1051.2 gallons, but in the EAC forms a total of 2,000 gallons is used for cleanup in EUs K004 and K005. Further, although n-propyl alcohol is identified as the cleanup solvent in Item 12 in the EAC forms for these EUs, Item 7 in the EAC form for EU K004 indicates an alcohol/acetate is used for cleanup. No cleanup solvent use was identified in the EAC form for EU K001.

- 5) Except for the EU K006 emissions included in the emissions calculations, the application is unclear about whether there are other VOC sources, including de minimis and permit exempt sources, at this facility that need to be considered as part of the requested synthetic minor restriction on VOC emissions to avoid Title V.

Your application is being returned to you as incomplete. Please provide the additional information and corrections identified above and reapply by submitting a new application via Air Services.

Note that OAC rule 3745-31-02 prohibits the construction, installation or modification of any air contaminant source (emissions unit) without first obtaining a final permit-to-install or permit-to-install and operate. The application identified that a modification of EU K001 occurred in February of 2011 when Primary Packaging began using a new coating that contained greater than 0.5 lb VOC/gallon, the coating content on which the BAT limits for EU K001 are based. Based upon the date of the coating change, the company has modified EU K001 without applying for and obtaining a modification of the permit for this EU and will remain in violation of OAC rule 3745-31-02 until a final modified permit is obtained.

If you have any questions concerning this letter or your application, please contact me at kimbra.reinbold@epa.ohio.gov or 740-380-5245.

Sincerely,



Kimbra L. Reinbold
Division of Air Pollution Control
Southeast District Office

KLR/mlm

cc: Sarah Harter, DAPC, SEDO
Bruce Weinberg, DAPC, SEDO