

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install 08-04712

A. Source Description

Emissions unit K003 consists of 2 roll coaters with dip tanks, a flexographic printing press, and drying oven used for the manufacture and production of sandpaper products. Emissions from the printer operations are uncontrolled and . Emissions from coating operation and drying oven unit will be vented to the Anguil Environmental Systems regenerative thermal oxidizer. The capture efficiency will be 100% by use of a permanent total enclosure. A minimum of 95% destruction efficiency will be achieved by the regenerative thermal oxidizer.

B. Facility Emissions and Attainment Status

Ali Industries is located Greene County which is currently non-attainment for ozone and PM2.5. There is only one other emissions unit currently at the facility, P001 (abrasive belt assembly; inline scuffing/gluing). The facility is currently not a major source of VOC emissions as defined by Title V or for MACT applicability (i.e., Subpart JJJJ). After implementing the use of new coating material reflected in this PTI, the facility will remain not major with respect to VOC. With regard to HAP emissions, Ali Industries will not be a major source of combined HAP emissions, however, they will have the potential to be a major source for a single HAP, phenol. This synthetic minor PTI will require federally enforceable operating restrictions requiring use of permanent total enclosure and the oxidizer control system for K003, ensuring the HAPs emissions are maintained below thresholds to prevent triggering major source permitting requirements. The potential emissions from each emissions unit at the facility are listed in the Table 1.

Table 1. Potential To Emit

EU	P001	K003	Total
OC (TPY)	9.1	22.35	31.45
Formaldehyde (TPY)	-	7.45	7.45
Phenol (TPY)	-	14.9	14.9
Combined HAP (TPY)	0	22.35	22.35

C. Source Emissions

The PTE of total VOC and HAP for K003 is 5.1 lb/hr and 22.35 TPY before control. This is less than the 100 TPY threshold for Title V, and the total combined HAP PTE (phenol and formaldehyde) is less than the 25 TPY threshold. However, the PTE of a single HAP compound is 15 TPY (i.e. phenol), which is greater than the 10 TPY Title V threshold. Ali Industries has requested federally enforceable operating restrictions requiring the use of permanent total enclosure and the oxidizer control system for K003 to ensure the HAP emissions are maintained below major source thresholds to prevent triggering Title V permitting requirements. The after control PTE for K003 will be 0.26 lb/hr and 1.12 TPY. The prior annual emissions limitation for K003 contained in PTI 08-4072 was 10.14 TPY VOC. Due to the addition of controls, a net decrease of 9.02 TPY VOC will result, which will be all HAPs when using the new coating.

D. Conclusion

This PTI will be issued as a synthetic minor containing federally enforceable requirements to ensure the HAP emissions for the facility are maintained below the Title V and MACT thresholds. It will require use of permanent total enclosure for the capture of emissions and the oxidizer system for destruction of emissions, limiting the emission rates of VOC to 1.12 TPY. These restrictions will insure the individual HAP emissions will be much less below 9.9 TPY and the combined HAP emissions will be much less than 24.9 TPY. Monthly monitoring, record keeping and quarterly deviation reporting will be required to monitor compliance. Therefore, through federally enforceable terms and conditions and record keeping requirements, Ali will not trigger major Title V for HAP emissions.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
GREENE COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 08-04712

Fac ID: 0829060557

DATE: 9/20/2005

Ali Industries, Inc
Chris Ali
611 Yellow Springs Road
Fairborn, OH 453247677

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Reg Planning Commission

KY

IN

GREENE COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04712 FOR AN AIR CONTAMINANT SOURCE FOR
Ali Industries, Inc**

On 9/20/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ali Industries, Inc**, located at **611 Yellow Springs Road, Fairborn, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04712:

chapter 31 modification replacing PTI 08-04072 issued 10/6/99 to increase emissions and adding control device.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04712

Application Number: 08-04712
Facility ID: 0829060557
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ali Industries, Inc
Person to Contact: Chris Ali
Address: 611 Yellow Springs Road
Fairborn, OH 453247677

Location of proposed air contaminant source(s) [emissions unit(s)]:
**611 Yellow Springs Road
Fairborn, Ohio**

Description of proposed emissions unit(s):
chapter 31 modification replacing PTI 08-04072 issued 10/6/99 to increase emissions and adding control device.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

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, 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.
- 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 of federally enforceable 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 made to the appropriate Ohio EPA District Office or local air agency. The written

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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 shall be submitted pursuant to 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 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

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permittee shall comply with the requirement to register such a plan.

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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 re-issuance, or modification
- 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, 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 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

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permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- 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.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

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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.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, 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. 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

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of any transfer of this permit.**

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. 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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	1.12
Single HAP	9.9
Combined HAPs	24.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K003 - Adhesive Paper Coating Process with Two Roll Coaters with Dip Tanks, a Flexographic Printer, and Drying Oven, with a permanent total enclosure and regenerative thermal oxidizer *Modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09 (B)(6)
	OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V)	OAC 3745-21-09(Y)
	OAC rule 3745-21-09(F)	

Ali Inc**PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **K003**

Applicable Emissions
Limitations/Control Measures

The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.26 pound per hour (lb/hr) and 1.12 tons per year (TPY).

The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-09(F) and 3745-21-09(Y).

See Sections A.2.a. through ce. below.

The emissions of hazardous air pollutants (HAP) shall not exceed 9.9 TPY for a single HAP and 24.9 TPY for any combination of HAPs, based on a rolling 12-month summation.

In lieu of complying with the VOC content restriction specified by this rule, the permittee will employ a control system. See section A.2.b. below.

The VOC capture and control efficiency requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A).

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The VOC content requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A). See section A.2.e below.

2. Additional Terms and Conditions

- 2.a** The 0.26 pounds of VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b** The VOC emissions from this emissions unit shall be controlled through the application of a permanent total enclosure (PTE) to capture 100% of the emissions, and a regenerative thermal oxidizer system operating at a minimum of 95% destruction efficiency to achieve a minimum 95% overall (capture times destruction) VOC control efficiency.
- 2.c** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the facility shall not exceed 9.9 TPY for a single HAP and 24.9 TPY for any combination of HAPs, based on a rolling 12-month summation.
- 2.d** The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections B.1, C.2, and D.1.c), to insure the integrity of the PTE. The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring device(s) and a recorder which simultaneously and continuously measures and records the average facial velocity or pressure differential across the PTE.

If the permittee elects not to perform the additional demonstration or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the average facial velocity or differential pressure monitoring, record keeping, and reporting and testing requirements specified below (see Sections B.1, B.2.c, B.3, C.2, D.1.c, and E.6.a), to ensure the integrity of the PTE.

- 2.e** The permittee operates a flexographic printer at the head of the paper coating line operation which is not part of the PTE. which It is subject to OAC rule 3745-21-09 (Y) and the best available technology provisions of OAC rule 3745-31-05 (A)(3). The inks employed in this printer have a VOC content of 0.002 lb/lb ink, or 0.2 % by weight. The projected maximum annual VOC emissions associated with the flexographic printing have been determined to be 166 lbs (0.083 TPY). This satisfies the BAT requirement. Due to the trivial nature of this printing VOC record keeping and reporting requirements have been determined to not be necessary.

B. Operational Restrictions

1. A permanent total enclosure shall be constructed to enclose the application stations, coating reservoirs, and all areas from the application station to the oven. If the oven is operated under negative pressure, it does not need to be enclosed as long as there is no leakage between the coating application and the oven. Differential pressure gauge(s) shall be installed across the natural draft openings (NDO) to continuously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated, and

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maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. A permanent total enclosure shall be constructed to enclose the application stations, coating reservoirs, and all areas from the application station to the oven. If the oven is operated under negative pressure, it does not need to be enclosed as long as there is no leakage between the coating application and the oven. Air flow monitor(s) or differential pressure gauge(s) shall be installed to continuously measure and record the average facial velocity or pressure differential across the enclosure in accordance with 40 CFR Part 51, Appendix M, Method 204. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

2. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed, installed, maintained, and operated in accordance with 40 CFR Part 51, Appendix M, Method 204, whenever the emissions unit is in operation. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure is to be assumed to be 100%, with no other requirement for it to be measured:
 - a. any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point;
 - b. the total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
 - c. the direction of air flow through all any natural draft opening shall be into the enclosure, with an average facial velocity through all natural draft openings being no less than 3,600 m/hr (200 fpm) which corresponds to a pressure drop of 0.013 mm Hg (0.007 in.H₂O);
 - d. all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in (b) and are not included in the calculation in paragraph (c), shall be completely closed to any air movement during process operations; and
 - e. all VOC emissions shall be captured and contained for discharge through the control device.

By satisfying the above criteria for a permanent total enclosure, the VOC capture efficiency shall be assumed to be 100%. The permanent total enclosure shall be

Emissions Unit ID: **K003**

maintained under negative pressure whenever the emissions unit is in operation, and shall be designed, installed, maintained, and operated in accordance with 40 CFR Part 51, Appendix M, Method 204, whenever the emissions unit is in operation. The permanent total enclosure shall meet all of the following criteria :

- a. any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point;
- b. the total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
- c. the direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity through all natural draft openings being no less than 3,600 m/hr (200 fpm) corresponding to a pressure drop of 0.013 mm Hg (0.007 in.H₂O);
- d. all access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in (b) and are not included in the calculation in paragraph (c), shall be completely closed to any air movement during process operations; and
- e. all VOC emissions shall be captured and contained for discharge through the control device.

By satisfying the above criteria for a permanent total enclosure, the VOC capture efficiency shall be assumed to be 100%.

3. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 inch of water), as a 3-hour average, whenever the emissions unit is in operation.
4. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall be not less than 1500 degrees Fahrenheit, or not more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
5. The thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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C. Monitoring and/or Record keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 monitor and recorder 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 each day for the coating line and control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit is in operation, was less than 1500 degrees Fahrenheit, or more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.
2. The permittee shall record and maintain the following information on a daily basis:
 - a. the average facial velocity of the air flow through or the pressure differential across the natural the draft openings; and
 - b. all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
 - a. the average facial velocity of the air flow through or the pressure differential across the enclosure; and
 - b. all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the average facial velocity of 3,600 meters per hour (200 feet per minute) or the minimum pressure differential of 0.007 inch of water, as a 3-hour average.
3. The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

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- a. the measured diameter surface area of each natural draft opening;
 - b. the distance measured from each natural draft opening to each VOC emitting point;
 - c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;
 - d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
 - e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.
4. The permittee shall collect and record the following information each month for this emission unit for the purpose of determining annual VOC emissions:
- a. the name and company identification of each coating material employed;
 - b. the number of gallons of each coating material employed;
 - c. the VOC content of each coating material employed, in pounds per gallon;
 - d. the name and company identification of each cleanup material employed;
 - e. the number of gallons of each cleanup material employed;
 - f. the VOC content of each cleanup material employed, in pounds per gallon;
 - g. the total uncontrolled VOC usage rate (VOC input rate) for all coatings and cleanup employed [i.e., the summation of (b x c) + (e x f) for all materials], in tons; and
 - h. the total calculated controlled VOC emission rate for all coatings and cleanup materials, in 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 [i.e., (g) multiplied by a factor of (1 - the overall control efficiency)]).
5. The permittee shall collect and record the following information each month for the

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entire facility for the purpose of determining the HAP^{*} emissions:

- a. the name and company identification of each coating material employed;
- b. the individual HAP content for each HAP of each coating material employed, in pounds of individual HAP per gallon, as applied;
- c. the total combined HAP content of each coating material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (b)], as applied;
- d. the number of gallons of each coating material employed;
- e. the name and company identification of each cleanup material employed;
- f. the individual HAP content for each HAP of each cleanup material employed, in pounds of individual HAP per gallon, as applied;
- g. the total combined HAP content of each cleanup material employed, in pounds of combined HAP per gallon [i.e., the sum of individual HAP contents from (f)], as applied;
- h. the number of gallons of each cleanup material employed;
- i. the after control total individual HAP emissions for each HAP from all coating and cleanup materials employed [i.e., the summation of $(b \times d) + (f \times h)$, multiplied by $(1 - \text{the overall control efficiency})$], in tons;
- j. the after control total combined HAP emissions from all coating and cleanup materials employed [i.e., the summation of $(c \times d) + (g \times h)$, multiplied by $(1 - \text{the overall control efficiency})$], in tons;
- k. the rolling 12-month summation of the total individual HAP emissions for each HAP from all coating and cleanup materials [i.e., the rolling 12-month summation of (i)], in tons per year; and
- l. the rolling 12-month summation of the total combined HAP emissions from all coating and cleanup materials [i.e., the rolling 12-month summation of (j)], in tons per year.

The after control HAP emission rates shall be calculated using the overall control

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efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

*A listing of the Hazardous Air Pollutants can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency.

Material Safety Data Sheets typically include a listing of the solvents contained in the coating or cleanup materials. This information does not have to be kept on a emission unit-by-emission unit basis.

D. Reporting Requirements

1. The permittee shall submit quarterly summary reports, in accordance with the General Terms and Conditions of this permit, that identify any of the following records when the emissions unit was in operation:
 - a. any period of time in which a natural draft opening to the enclosure was located at a distance of less than four equivalent opening diameters, or less than 4 times the diameter of the opening, from any VOC emitting point;
 - b. any period of time in which the total area of all natural draft openings exceeded 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;
 - c. any period of time in which the average facial velocity of the air through the natural draft openings flow into the enclosure was less than 3,600 meters per hour (200 feet per minute) or identify all 3-hour blocks of time during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.013 mm Hg (0.007 inch of water), as a 3-hour average;
 - d. any period of time in which an access door or window to the enclosure, that does not meet the requirements of a natural draft opening and whose surface area was not included in the 5 percent surface area determination, was not completely closed to air movement;
 - e. any period of time in which any access doors or window was opened during process operations;
 - f. any period of times in which less than 100% of the VOC emissions were captured for discharge through the control device or the control device was bypassed;

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- g. a summary which includes a log of the downtime for the capture (collection) system, control device, and monitoring equipment;
- h. identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in this permit; and
- i. identification of any exceedances of the HAPs emission limits.

The report shall include the date and number of hours that the emissions unit was operating under each non-compliant scenario.

These quarterly deviation reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall submit annual reports which specify the total volatile organic compound emissions from this emissions unit, the individual HAP emissions from the facility, and the combined HAPs emissions from the facility. These reports shall be submitted by January 31 of each year and shall cover for the previous calendar year.

E. Testing Requirements

Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation-
The volatile organic compound emissions from this emissions unit shall not exceed 0.26 pound per hour (lb/hr).

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum coating usage rate of 17 gal/hour multiplied by the worst case coating VOC content of 3% by weight, multiplied by a coating density of 10.01 lb/gal, and then multiplied by the overall control efficiency of (1-0.95).

2. Emission Limitation-
The volatile organic compound emissions from this emissions unit shall not exceed 1.12 tons per year.

Applicable Compliance Method-

Compliance shall be determined by the record keeping as specified in Section C.4 of

this permit.

3. Emission Limitation-

The emissions of hazardous air pollutants (HAP) shall not exceed 9.9 TPY for a single HAP and 24.9 TPY for any combination of HAPs, based on a rolling 12-month summation.

Applicable Compliance Method-

Compliance shall be demonstrated by record keeping in Terms C.5 of this permit.

4. The permittee shall conduct, or have conducted, emissions and compliance demonstration testing on this emissions unit within 180 days after installation and startup of the emission unit, in accordance with the following requirements:
- a. Emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate and overall control efficiency of 95% for organic compounds. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 18 of 40 CFR Part 60, Appendix A and Method 25 or 25A of 40 CFR Part 60, Appendix A, as appropriate, before and after the regenerative thermal oxidizer, to demonstrate compliance with the destruction efficiency for volatile organic compounds. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - b. A compliance demonstration for the permanent total enclosure shall be conducted to demonstrate compliance with the capture efficiency requirement. The following test method(s) shall be employed to demonstrate compliance: Method 204 of 40 CFR Part 60, Appendix A to demonstrate the permanent total enclosure can achieve 100% capture efficiency.
 - c. If formulation data is not available and/or if required by the regulating agency, Method 24 or 24A of 40 CFR Part 60, Appendix A shall be conducted for the organic content of the solvent materials applied. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
5. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through, or the pressure differential across, the natural draft openings in accordance with 40 CFR Part 51, Appendix M, Method 204. The continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration either by checking the direction of air flow or pressure meter(s), or

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through the use of streamers, smoke tubes, or tracer gases at each natural draft opening. All closed access doors and windows that are not considered natural draft openings shall also be checked once during the compliance demonstration for leakage around their perimeter using smoke tubes or tracer gases.

The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening during the compliance demonstration:

- a. the diametermeasured surface area of each natural draft opening;
 - b. the distance measured from each natural draft opening to each VOC emitting point in the process;
 - c. the distance measured from each exhaust duct or hood in the enclosure to each natural draft opening; and
 - d. the total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor, and ceiling.
6. In accordance with 40 CFR Part 51, Appendix M, Method 204, Ccompliance with the requirements with for a permanent total enclosure shall be demonstrated if the following determinations are documented during testing:
- a. the average facial velocity through the natural draft openings of the air flow into the enclosure is maintained at a minimum of 3,600 m/hr (200 feet per minute) or at a minimum pressure differential of 0.013 mm Hg (0.007 in. of water);
 - b. each natural draft opening is at a distance of at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point in the process;
 - c. the sum of the surface areas of all of the natural draft openings in the total enclosure are not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling; calculated by dividing the total area of all natural draft openings by the total inside surface area of the enclosure;
 - d. there is no leakage detected at any of the closed access doors and windows, and it is certified that they always remain closed during process operations; and
 - e. all VOC emissions captured by the permanent total enclosure are entirely vented

for discharge through the control device.

7. The emissions and compliance demonstration testing tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or Local Air Agency shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

8. Formulation data shall be used to determine the HAP contents of the coating and cleanup materials.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: Sections A.1 (only the requirements associated with OAC 3745-35-07(B)), A.2.b-de, B.1-6, C.1-5, D.1, and E.5.
2. This is a modification to PTI 08-4072 issued on October 6, 1999 representing a change in coating material increasing VOC and HAP emissions, and requiring use of capture and control system as federally enforceable requirements. The terms of condition of

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Ali Inc

PTI A

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this PTI supercedes those of PTI 08-4072.

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