



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
MIAMI COUNTY
Application No: 08-04800
Fac ID: 0855140350**

CERTIFIED MAIL

DATE: 3/4/2008

Spinnaker Coating Plant 2
Ronald Dye
130 Marybill Drive
Troy, OH 45373-1053

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of \$ 0 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, Permit Issuance and Data Management 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 PLAN COMM

IN

MIAMI COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04800 FOR AN AIR CONTAMINANT SOURCE
FOR Spinnaker Coating Plant 2

On 3/4/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Spinnaker Coating Plant 2**, located at **130 Marybill Dr., Troy, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04800:

Administrative modification to revise rolling limit and revise MACT citations.

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 MODIFICATION OF PERMIT TO INSTALL 08-04800

Application Number: 08-04800
Facility ID: 0855140350
Permit Fee: **To be entered upon final issuance**
Name of Facility: Spinnaker Coating Plant 2
Person to Contact: Ronald Dye
Address: 130 Marybill Drive
Troy, OH 45373-1053

Location of proposed air contaminant source(s) [emissions unit(s)]:
**130 Marybill Dr.
Troy, Ohio**

Description of proposed emissions unit(s):
Administrative modification to revise rolling limit and revise MACT citations.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Spinnaker Coating Plant 2

PTI Application: 08-04800

Issued: To be entered upon final issuance

Facility ID: 0855140350

Part I - GENERAL TERMS AND CONDITIONS

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and 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 permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Spinnaker Coating Plant 2

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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.

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- 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.

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12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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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 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

Spinnaker Coating Plant 2

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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.

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC | 91.3 |

Spinnaker Coating Plant 2

PTI Application: 08-04800

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Facility ID: 0855140350

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. The following emissions units contained in this permit are subject to MACT Subpart JJJJ (Paper and Other Web Coatings): K001, K002, K003 and K004. The complete MACT requirements, including the MACT General provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Regional Air Pollution Control Agency (RAPCA).

Affected sources must choose to comply with one of four emissions limits that are included in 40 CFR 63.3320(b). The permittee has chosen to comply with 40 CFR 63.3320(b)(2), which states that organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month. In addition, permittee must choose a compliance method from 40 CFR 63.3370(a); they have chosen to use "as purchased" compliant coating materials and will comply with the limits using the procedure set out in 40 CFR 63.3370(b).

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. 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.

Operations, Property, and/or Equipment - (K001) - Water-based Adhesive Paper Coating Line with Natural Gas-fired Oven; Coater No. 18

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|--|
| OAC rule 3745-31-05(C) (Synthetic minor to avoid being classified as a major stationary source per OAC rule 3745-31-01(KKK)) | Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 21.0 tons per rolling 12-month period. |
| OAC rule 3745-31-05(A)(3) | The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(F), 3745-21-09(H) and 3745-31-05(C). |
| OAC rule 3745-21-09(F) | When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| OAC rule 3745-21-09(H) | When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| 40 CFR 60.440(b) (40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations) | See A.I.2.a below. |
| 40 CFR 63.3320(b)(2) (40 CFR Part 63, Subpart JJJJ - National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating) | Organic Hazardous Air Pollutant (HAP) emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month. See A.I.2.b below. |

Emissions Unit ID: K001

| | |
|---|--|
| <p>40 CFR 63.1 through 15 (40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions)</p> | <p>Table 2 to Subpart JJJJ of 40 CFR Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General provisions in 40 CFR 63.1 through 15 apply.</p> |
|---|--|

2. Additional Terms and Conditions

- 2.a** Any affected facility (i.e., coating line) which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60 Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR Part 60 Subpart RR. VOC emissions are limited to 21.0 tons per rolling 12-month period per OAC rule 3745-31-05(C), therefore, this emissions unit is not subject to the emissions limits of 40 CFR 60.442(a).
- 2.b** Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased in accordance with 40 CFR 63.3370(a)(1)(i).

II. Operational Restrictions

- 1. The annual VOC input for this emissions unit shall not exceed 21.0 tons per year, based upon a rolling, 12-month summation of the VOC input .

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the VOC input levels specified in the following table:

| Month | Maximum Allowable Cumulative VOC input (tons) |
|-------|---|
| 1 | 5.25 |
| 1-2 | 10.5 |
| 1-3 | 15.75 |
| 1-4 | 21.0 |
| 1-5 | 21.0 |
| 1-6 | 21.0 |
| 1-7 | 21.0 |
| 1-8 | 21.0 |
| 1-9 | 21.0 |

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| | |
|------|------|
| 1-10 | 21.0 |
| 1-11 | 21.0 |
| 1-12 | 21.0 |

After the first 12 calendar months of operation, compliance with the annual VOC input limitation shall be based upon the rolling, 12-month summation of the VOC input rates.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name, identification number, and substrate (paper or vinyl) of each coating, as applied;
 - b. the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
 - d. the name and identification of each preparation and cleanup material employed;
 - e. the VOC content of each preparation and cleanup material, in pounds per gallon;
 - f. the number of gallons of each preparation and cleanup material employed;
 - g. the total VOC emissions from all coatings, preparation and cleanup materials employed, in tons;
 - h. the rolling, 12-month summation of VOC emissions, in tons; and,
 - i. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the VOC input rates.

During the first 12 calendar months of operation, the permittee shall record the cumulative VOC input of this emissions unit.

2. The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

Emissions Unit ID: K001

- 63.3360(c)(1), (2) or (3) - performance test for organic HAP content
- 63.3370(a)(1) and (b) - demonstrating compliance using "as-purchased" compliant coating materials
- 63.3410(a)(1)(iii) and (vi) - records of organic HAP content data

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12-month VOC input limitation; and for the first 12 calendar months of operation, all exceedances of the allowable cumulative VOC input ; and
 - b. the rolling, 12-month summation of VOC emissions.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).
4. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart JJJJ, per the following section:

63.3400(c) - semiannual compliance report

V. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation
VOC emissions from this emissions unit shall not exceed 21.0 tons per rolling

Emissions Unit ID: K001

12-month period.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.

b. Emissions Limitation

When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.

c. Emissions Limitation

When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.

d. Emissions Limitations

Organic HAP emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.

Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased.

Applicable Compliance Method

Compliance with the emissions limitations shall be based upon the record keeping specified in A.III.2.

VI. Miscellaneous Requirements

1. This is an administrative modification to PTI 08-04800 and represents no increase in emissions.

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B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (K001) - Water-based Adhesive Paper Coating Line with Natural Gas-fired Oven; Coater No. 18

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|-------------------------------|---|
| None | None |

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. 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.

Operations, Property, and/or Equipment - (K002) - Slot Die Coating Line with Natural Gas-fired Hot Air Oven; Coater No. 19

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|--|--|
| OAC rule 3745-31-05(C) (Synthetic minor to avoid 40 CFR 60.442(a) and being classified as a major stationary source per OAC rule 3745-31-01(KKK)) | Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 49.0 tons per rolling 12-month period. |
| OAC rule 3745-31-05(A)(3) | The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-21-09(F), 3745-21-09(H) and 3745-31-05(C). |
| OAC rule 3745-21-09(F) | When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| OAC rule 3745-21-09(H) | When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| 40 CFR 60.440(b) (40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations) | See A.I.2.a below. |
| 40 CFR 63.3320(b)(2) (40 CFR Part 63, Subpart JJJJ - National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating) | Organic Hazardous Air Pollutant (HAP) emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month. See A.I.2.b below. |

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| | |
|--|---|
| 40 CFR 63.1 through 15 (40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions) | Table 2 to Subpart JJJJ of 40 CFR Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General provisions in 40 CFR 63.1 through 15 apply. |
| OAC rule 3745-21-08(B) | Carbon monoxide (CO) emissions from this emissions unit shall not exceed 1.3 lbs/hr. See A.I.2.c below. |
| 3745-31-05(A)(3)(b) | See A.I.2.d below. |

2. Additional Terms and Conditions

- 2.a** Any affected facility (i.e., coating line) which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60 Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR Part 60 Subpart RR. VOC emissions are limited to 49.0 tons per rolling 12-month period per OAC rule 3745-31-05(C), therefore, this emissions unit is not subject to the emissions limits of 40 CFR 60.442(a).
- 2.b** Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased in accordance with 40 CFR 63.3370(a)(1)(i).
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating

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practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled NO_x and CO emissions from this air contaminant source since the potential to emit for NO_x and CO is less than ten tons per year.

II. Operational Restrictions

1. The annual VOC input for this emissions unit shall not exceed 49.0 tons per year, based upon a rolling, 12-month summation of the VOC input .

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the VOC input levels specified in the following table:

| Month | Maximum Allowable Cumulative VOC input (tons) |
|-------|--|
| 1 | 12.25 |
| 1-2 | 24.5 |
| 1-3 | 36.75 |
| 1-4 | 49.0 |
| 1-5 | 49.0 |
| 1-6 | 49.0 |
| 1-7 | 49.0 |
| 1-8 | 49.0 |
| 1-9 | 49.0 |
| 1-10 | 49.0 |
| 1-11 | 49.0 |
| 1-12 | 49.0 |

After the first 12 calendar months of operation, compliance with the annual VOC input limitation shall be based upon the rolling, 12-month summation of the VOC input rates.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
- the name, identification number, and substrate (paper or vinyl) of each coating, as applied;
 - the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - the number of gallons (excluding water and exempt solvents) of each coating employed;

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- d. the name and identification of each preparation and cleanup material employed;
- e. the VOC content of each preparation and cleanup material, in pounds per gallon;
- f. the number of gallons of each preparation and cleanup material employed;
- g. the total VOC emissions from all coatings, preparation and cleanup materials employed, in tons;
- h. the rolling, 12-month summation of VOC emissions, in tons; and,
- i. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the VOC input rates.

During the first 12 calendar months of operation, the permittee shall record the cumulative VOC input of this emissions unit.

2. The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3360(c)(1), (2) or (3) - performance test for organic HAP content

63.3370(a)(1) and (b) - demonstrating compliance using "as-purchased" compliant coating materials

63.3410(a)(1)(iii) and (vi) - records of organic HAP content data

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12-month VOC input limitation; and for the first 12 calendar months of operation, all exceedances of the allowable cumulative VOC input ; and

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- b. the rolling, 12-month summation of VOC emissions.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

- 3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

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4. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart JJJJ, per the following section:

63.3400(c) - semiannual compliance report

V. Testing Requirements

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

- a. Emissions Limitation

VOC emissions from this emissions unit shall not exceed 49.0 tons per rolling 12-month period.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.

- b. Emissions Limitation

When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.

- c. Emissions Limitation

When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.

- d. Emissions Limitation

Organic HAP emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.

Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased.

Applicable Compliance Method

Compliance with the emissions limitations shall be based upon the record

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keeping specified in A.III.2.

- e. Emissions Limitation
CO emissions from this emissions unit shall not exceed 1.3 lbs/hr.

Applicable Compliance Method

Compliance shall be determined using AP-42 Table 1.4-1 (July 1998) and inputs representing the potential to emit, as follows:

$$\begin{aligned} \text{Emissions} &= (\text{maximum heat input rating}) * (\text{emission factor}) * (\text{fuel heat content}) \\ \text{Emissions} &= (3 * 5 \text{ mmBtu/hr}) * (84 \text{ lb/mmcf}) * (1,000 \text{ mmBtu/mmcf}) = 1.26 \text{ lbs/hr} \end{aligned}$$

If required, compliance shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

VI. Miscellaneous Requirements

1. This is an administrative modification to PTI 08-04800 and represents no increase in emissions.

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B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (K002) - Slot Die Coating Line with Natural Gas-fired Hot Air Oven; Coater No. 19

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|-------------------------------|---|
| None | None |

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (K003) - Hot Melt Extrusion Paper Coating Line; Coater No. 17

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|--|
| OAC rule 3745-31-05(C) (Synthetic minor to avoid being classified as a major stationary source per OAC rule 3745-31-01(KKK)) | Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 4.5 tons per rolling 12-month period. |
| OAC rule 3745-21-09(F) | When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| OAC rule 3745-21-09(H) | When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| 40 CFR 60.440(b) (40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations) | See A.I.2.a below. |
| 40 CFR 63.3320(b)(2) (40 CFR Part 63, Subpart JJJJ - National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating) | Organic Hazardous Air Pollutant (HAP) emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month. See A.I.2.b below. |

Emissions Unit ID: K003

| | |
|--|---|
| 40 CFR 63.1 through 15 (40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions) | Table 2 to Subpart JJJJ of 40 CFR Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General provisions in 40 CFR 63.1 through 15 apply. |
| 3745-31-05(A)(3)(b) | See A.I.2.c below. |

2. Additional Terms and Conditions

- 2.a** Any affected facility (i.e., coating line) which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60 Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR Part 60 Subpart RR. VOC emissions are limited to 4.5 tons per rolling 12-month period per OAC rule 3745-31-05(C), therefore, this emissions unit is not subject to the emissions limits of 40 CFR 60.442(a).
- 2.b** Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased in accordance with 40 CFR 63.3370(a)(1)(i).
- 2.c** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled emissions from this air contaminant source since the potential to emit is less than ten tons per year.

II. Operational Restrictions

- 1. The annual VOC input for this emissions unit shall not exceed 4.5 tons per year, based upon a rolling, 12-month summation of the VOC input .

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the VOC input levels specified in the following table:

| Month | Maximum Allowable Cumulative VOC input (tons) |
|-------|---|
| 1 | 1.125 |
| 1-2 | 2.25 |
| 1-3 | 3.375 |
| 1-4 | 4.5 |
| 1-5 | 4.5 |
| 1-6 | 4.5 |

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| | |
|------|-----|
| 1-7 | 4.5 |
| 1-8 | 4.5 |
| 1-9 | 4.5 |
| 1-10 | 4.5 |
| 1-11 | 4.5 |
| 1-12 | 4.5 |

After the first 12 calendar months of operation, compliance with the annual VOC input limitation shall be based upon the rolling, 12-month summation of the VOC input rates.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name, identification number, and substrate (paper or vinyl) of each coating, as applied;
 - b. the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating employed;
 - d. the name and identification of each preparation and cleanup material employed;
 - e. the VOC content of each preparation and cleanup material, in pounds per gallon;
 - f. the number of gallons of each preparation and cleanup material employed;
 - g. the total VOC emissions from all coatings, preparation and cleanup materials employed, in tons;
 - h. the rolling, 12-month summation of VOC emissions, in tons; and,
 - i. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the VOC input rates.

During the first 12 calendar months of operation, the permittee shall record the cumulative VOC input of this emissions unit.

Emissions Unit ID: K003

2. The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3360(c)(1), (2) or (3) - performance test for organic HAP content

63.3370(a)(1) and (b) - demonstrating compliance using "as-purchased" compliant coating materials

63.3410(a)(1)(iii) and (vi) - records of organic HAP content data

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IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12-month VOC input limitation; and for the first 12 calendar months of operation, all exceedances of the allowable cumulative VOC input ; and
 - b. the rolling, 12-month summation of VOC emissions.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).
4. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart JJJJ, per the following section:

63.3400(c) - semiannual compliance report

V. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation
VOC emissions from this emissions unit shall not exceed 4.5 tons per rolling 12-month period.

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Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.

b. Emissions Limitation

When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.

c. Emissions Limitation

When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.

d. Emissions Limitations

Organic HAP emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.

Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased.

Applicable Compliance Method

Compliance with the emissions limitations shall be based upon the record keeping specified in A.III.2.

VI. Miscellaneous Requirements

1. This is an administrative modification to PTI 08-04800 and represents no increase in emissions.

B. State Only Enforceable Section**I. 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.

Operations, Property, and/or Equipment - (K003) - Hot Melt Extrusion Paper Coating Line; Coater No. 17

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|-------------------------------|---|
| None | None |

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (K004) - Silicone Paper Coating Line with Natural Gas-fired Drying Oven; Coater No. 20

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|--|--|
| OAC rule 3745-31-05(C) (Synthetic minor to avoid being classified as a major stationary source per OAC rule 3745-31-01(KKK)) | Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 16.8 tons per rolling 12-month period. |
| OAC rule 3745-31-05(A)(3) | The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-21-09(F), 3745-21-09(H) and 3745-31-05(C). |
| OAC rule 3745-21-09(F) | When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| OAC rule 3745-21-09(H) | When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| 40 CFR 60.440(b) (40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations) | See A.I.2.a below. |
| | |

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| | |
|---|--|
| 40 CFR 63.3320(b)(2) (40 CFR Part 63, Subpart JJJJ - National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating) | Organic Hazardous Air Pollutant (HAP) emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month. See A.I.2.b below. |
| 40 CFR 63.1 through 15 (40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions) | Table 2 to Subpart JJJJ of 40 CFR Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General provisions in 40 CFR 63.1 through 15 apply. |
| OAC rule 3745-21-08(B) | Carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.9 lb/hr. See A.I.2.c below. |
| 3745-31-05(A)(3)(b) | See A.I.2.d below. |

2. Additional Terms and Conditions

- 2.a** Any affected facility (i.e., coating line) which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of 40 CFR 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60 Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to 40 CFR 60.442(a) and all other sections of 40 CFR Part 60 Subpart RR. VOC emissions are limited to 16.8 tons per rolling 12-month period per OAC rule 3745-31-05(C), therefore, this emissions unit is not subject to the emissions limits of 40 CFR 60.442(a).
- 2.b** Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased in accordance with 40 CFR 63.3370(a)(1)(i).
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

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On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled NO_x and CO emissions from this air contaminant source since the potential to emit for NO_x and CO is less than ten tons per year.

II. Operational Restrictions

1. The annual VOC input for this emissions unit shall not exceed 16.8 tons per year, based upon a rolling, 12-month summation of the VOC input .

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the VOC input levels specified in the following table:

| Month | Maximum Allowable Cumulative VOC input (tons) |
|-------|--|
| 1 | 4.2 |
| 1-2 | 8.4 |
| 1-3 | 12.6 |
| 1-4 | 16.8 |
| 1-5 | 16.8 |
| 1-6 | 16.8 |
| 1-7 | 16.8 |
| 1-8 | 16.8 |
| 1-9 | 16.8 |
| 1-10 | 16.8 |
| 1-11 | 16.8 |
| 1-12 | 16.8 |

After the first 12 calendar months of operation, compliance with the annual VOC input limitation shall be based upon the rolling, 12-month summation of the VOC input rates.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
- the name, identification number, and substrate (paper or vinyl) of each coating, as applied;

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- b. the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
- c. the number of gallons (excluding water and exempt solvents) of each coating employed;
- d. the name and identification of each preparation and cleanup material employed;
- e. the VOC content of each preparation and cleanup material, in pounds per gallon;
- f. the number of gallons of each preparation and cleanup material employed;
- g. the total VOC emissions from all coatings, preparation and cleanup materials employed, in tons;
- h. the rolling, 12-month summation of VOC emissions, in tons; and,
- i. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the VOC input rates.

During the first 12 calendar months of operation, the permittee shall record the cumulative VOC input of this emissions unit.

- 2. The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3360(c)(1), (2) or (3) - performance test for organic HAP content

63.3370(a)(1) and (b) - demonstrating compliance using "as-purchased" compliant coating materials

63.3410(a)(1)(iii) and (vi) - records of organic HAP content data

IV. Reporting Requirements

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:
 - a. the rolling, 12-month VOC input limitation; and for the first 12 calendar months of operation, all exceedances of the allowable cumulative VOC input ; and
 - b. the rolling, 12-month summation of VOC emissions.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).
4. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant

Emissions Unit ID: K004

to 40 CFR Part 63, Subpart JJJJ, per the following section:

63.3400(c) - semiannual compliance report

V. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation
VOC emissions from this emissions unit shall not exceed 16.8 tons per rolling 12-month period.

Applicable Compliance Method
Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.
 - b. Emissions Limitation
When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method
Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.
 - c. Emissions Limitation
When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method
Compliance with the emissions limitation shall be based upon the record keeping specified in A.III.1.
 - d. Emissions Limitations
Organic HAP emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.

Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased.

Applicable Compliance Method
Compliance with the emissions limitations shall be based upon the record keeping specified in A.III.2.

Issued: To be entered upon final issuance

- e. Emissions Limitation
CO emissions from this emissions unit shall not exceed 0.9 lb/hr.

Applicable Compliance Method

Compliance shall be determined using AP-42 Table 1.4-1 (July 1998) and inputs representing the potential to emit, as follows:

$$\begin{aligned} \text{Emissions} &= (\text{maximum heat input rating}) * (\text{emission factor}) * (\text{fuel heat content}) \\ \text{Emissions} &= (3 * 3.5 \text{ mmBtu/hr}) * (84 \text{ lb/mmcf}) * (1,000 \text{ mmBtu/mmcf}) = 0.9 \text{ lb/hr} \end{aligned}$$

If required, compliance shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

VI. Miscellaneous Requirements

1. This is an administrative modification to PTI 08-04800 and represents no increase in emissions.

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (K004) - Silicone Paper Coating Line with Natural Gas-fired Drying Oven; Coater No. 20

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|-------------------------------|---|
| None | None |

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 08-04800 Facility ID: 0855140350

FACILITY NAME Spinnaker Coating Plant 2

FACILITY DESCRIPTION Chapter 31 modification replacing CITY/TWP Troy
 PTIs 08-04643 issued 12/2/04, 08-0764 issued 5/22/85, 08-0962 issued 4/16/86 and 08-04644 issued 11/9/04 to increase emissions.

SIC CODE 2671 SCC CODE 4-02-013-01 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Water-based Adhesive Paper Coating Line with Natural Gas-fired Oven; Coater No. 18

DATE INSTALLED August 1980

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-------------------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Nonattainment | | | 2.9 lbs VOC/gal coating | 21.0 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? Subpart JJJJ

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC regulations and emissions limits, monitoring, record keeping, and reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

Vinyl acetate

NEW SOURCE REVIEW FORM B

PTI Number: 08-04800 Facility ID: 0855140350

FACILITY NAME Spinnaker Coating Plant 2

FACILITY DESCRIPTION Chapter 31 modification replacing CITY/TWP Troy

Emissions Unit ID: K004

to increase emissions.

SIC CODE 2671 SCC CODE 4-02-013-01 EMISSIONS UNIT ID K002
EMISSIONS UNIT DESCRIPTION Slot Die Coating Line with Natural Gas-fired Hot Air Oven; Coater No. 19
DATE INSTALLED October 1986

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-------------------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Nonattainment | | | 2.9 lbs VOC/gal coating | 49.0 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | Attainment | | | 1.3 lbs/hr | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? N/A NESHAP? Subpart JJJJ PSD? N/A OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC regulations and emissions limits, monitoring, record keeping, and reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Vinyl acetate

NEW SOURCE REVIEW FORM B

PTI Number: 08-04800 Facility ID: 0855140350

FACILITY NAME Spinnaker Coating Plant 2

FACILITY DESCRIPTION Chapter 31 modification replacing CITY/TWP Troy

Emissions Unit ID: K004

to increase emissions.

SIC CODE 2671 SCC CODE 4-02-013-01 EMISSIONS UNIT ID K003
 EMISSIONS UNIT DESCRIPTION Hot Melt Extrusion Paper Coating Line; Coater No. 17
 DATE INSTALLED November 1986

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-------------------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Nonattainment | | | 2.9 lbs VOC/gal coating | 4.5 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | | | | | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? N/A NESHAP? **Subpart JJJJ** PSD? N/A OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

N/A - PTE less than 10 tons/yr

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

4 NEW SOURCE REVIEW FORM B

PTI Number: 08-04800

Facility ID: 0855140350

FACILITY NAME Spinnaker Coating Plant 2

FACILITY DESCRIPTION Chapter 31 modification replacing

CITY/TWP Troy

Emissions Unit ID: K004

to increase emissions.

SIC CODE 2671

SCC CODE 4-02-013-01

EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Silicone Paper Coating Line with Natural Gas-fired Drying Oven; Coater No. 20

DATE INSTALLED July 1996

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-------------------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | | | | | |
| Sulfur Dioxide | | | | | |
| Organic Compounds | Nonattainment | | | 2.9 lbs VOC/gal coating | 16.8 |
| Nitrogen Oxides | | | | | |
| Carbon Monoxide | Attainment | | | 0.9 lb/hr | |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? N/A

NESHAP? Subpart JJJJ

PSD? N/A

OFFSET POLICY? N/A

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC regulations and emissions limits, monitoring, record keeping, and reporting

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

Ethyl benzene and toluene