



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 08-04849

Fac ID: 0857090718

DATE: 8/28/2007

Avery Dennison/Monarch
Jack Hood
PO Box 608 170 Monarch Ln
Miamisburg, OH 45342

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

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

CC: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 8/28/2007
Effective Date: 8/28/2007**

FINAL PERMIT TO INSTALL 08-04849

Application Number: 08-04849
Facility ID: 0857090718
Permit Fee: **\$1400**
Name of Facility: Avery Dennison/Monarch
Person to Contact: Jack Hood
Address: PO Box 608 170 Monarch Ln
 Miamisburg, OH 45342

Location of proposed air contaminant source(s) [emissions unit(s)]:

**170 Monarch Ln
Miamisburg, Ohio**

Description of proposed emissions unit(s):

Chapter 31 modification replacing PTI 08-03372 issued 3/8/01, 08-04106 issued 12/1/99 and 08-04343 for P018 only issued 4/2/02 to change operational restrictions and increase emission limits.

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

Chris Korleski
Director

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

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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.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.

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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 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>
OC	7.3
VOC	84.12

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

Emissions Unit ID: K050

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 - (K050) - Paper Coater/Laminator No. 247

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (Synthetic minor to avoid NSPS 40 CFR 60.442(a))	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)	VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(F) and 3745-31-05(C).
OAC rule 3745-21-09(F)	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.
40 CFR 60.440(b) (40 CFR Part 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations)	See A.I.2.a 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).

Emissions Unit ID: K050

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number 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 total VOC emissions from all coatings employed, in tons; and,
 - e. the rolling, 12-month summation of VOC emissions, in tons.
2. The permittee shall collect and record the following information each month for emissions units K050, K051, K052, K053, K055 and K056:
 - a. the name and identification number 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 cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in tons; and,
 - h. the rolling, 12-month summation of VOC emissions, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local

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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 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 emissions units K050, K051, K052, K053, K055 and K056 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 emissions units K050, K051, K052, K053, K055 and K056 in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

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

VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup.

Applicable Compliance Method

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

- c. Emissions Limitation

The VOC content of the coatings employed in this emissions unit shall not

Emissions Unit ID: K050

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.

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VI. Miscellaneous Requirements

1. The requirements of this permit supercede the requirements of PTI 08-03372 issued March 8, 2001 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 -(K050) - Paper Coater/Laminator No. 247

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 -(K051) - Paper Coater/Laminator No. 227

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (Synthetic minor to avoid NSPS 40 CFR 60.442(a))	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)	VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(F) and 3745-31-05(C).
OAC rule 3745-21-09(F)	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.
40 CFR 60.440(b) (40 CFR Part 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations)	See A.I.2.a 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

Emissions Unit ID: K051

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).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number 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 total VOC emissions from all coatings employed, in tons; and,
 - e. the rolling, 12-month summation of VOC emissions, in tons.
2. The permittee shall collect and record the following information each month for emissions units K050, K051, K052, K053, K055 and K056:
 - a. the name and identification number 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 cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in tons; and,
 - h. the rolling, 12-month summation of VOC emissions, in tons.

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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 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 emissions units K050, K051, K052, K053, K055 and K056 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 emissions units K050, K051, K052, K053, K055 and K056 in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

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
VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record

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keeping specified in A.III.2.

c. Emissions Limitation

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.

Emissions Unit ID: K051

VI. Miscellaneous Requirements

1. The requirements of this permit supercede the requirements of PTI 08-03372 issued March 8, 2001 and represents no increase in emissions.

Issued: 8/28/2007

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 -(K051) - Paper Coater/Laminator No. 227

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 -(K052) - Paper Coater/Laminator No. 229

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (Synthetic minor to avoid NSPS 40 CFR 60.442(a))	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)	VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(F) and 3745-31-05(C).
OAC rule 3745-21-09(F)	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.
40 CFR 60.440(b) (40 CFR Part 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations)	See A.I.2.a 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

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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).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number 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 total VOC emissions from all coatings employed, in tons; and,
 - e. the rolling, 12-month summation of VOC emissions, in tons.
2. The permittee shall collect and record the following information each month for emissions units K050, K051, K052, K053, K055 and K056:
 - a. the name and identification number 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 cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;

Emissions Unit ID: K052

- g. the total VOC emissions from all coatings and cleanup materials employed, in tons; and,
- h. the rolling, 12-month summation of VOC emissions, in tons.

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 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 emissions units K050, K051, K052, K053, K055 and K056 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 emissions units K050, K051, K052, K053, K055 and K056 in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

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
VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup.

Applicable Compliance Method
Compliance with the emissions limitation shall be based upon the record

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keeping specified in A.III.2.

c. Emissions Limitation

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.

Issued: 8/28/2007

VI. Miscellaneous Requirements

1. The requirements of this permit supercede the requirements of PTI 08-03372 issued March 8, 2001 and represents no increase in emissions.

Issued: 8/28/2007

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 - (K052) - Paper Coater/Laminator No. 229

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

Emissions Unit ID: K053

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 -(K053) - Paper Coater/Laminator No. 246

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (Synthetic minor to avoid NSPS 40 CFR 60.442(a))	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)	VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(F) and 3745-31-05(C).
OAC rule 3745-21-09(F)	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.
40 CFR 60.440(b) (40 CFR Part 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations)	See A.I.2.a 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).

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II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number 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 total VOC emissions from all coatings employed, in tons; and,
 - e. the rolling, 12-month summation of VOC emissions, in tons.

2. The permittee shall collect and record the following information each month for emissions units K050, K051, K052, K053, K055 and K056:
 - a. the name and identification number 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 cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in tons; and,

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- h. the rolling, 12-month summation of VOC emissions, in tons.

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 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 emissions units K050, K051, K052, K053, K055 and K056 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 emissions units K050, K051, K052, K053, K055 and K056 in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

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
VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup.

Applicable Compliance Method

Emissions Unit ID: K053

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

c. Emissions Limitation

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.

Issued: 8/28/2007

VI. Miscellaneous Requirements

1. The requirements of this permit supercede the requirements of PTI 08-03372 issued March 8, 2001 and represents no increase in emissions.

Issued: 8/28/2007

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 - (K053) - Paper Coater/Laminator No. 246

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

Issued: 8/28/2007

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 -(K055) - Paper Coater/Laminator No. 268

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (Synthetic minor to avoid NSPS 40 CFR 60.442(a))	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)	VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(F) and 3745-31-05(C).
OAC rule 3745-21-09(F)	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.
40 CFR 60.440(b) (40 CFR Part 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations)	See A.I.2.a 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

Emissions Unit ID: K055

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).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number 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 total VOC emissions from all coatings employed, in tons; and,
 - e. the rolling, 12-month summation of VOC emissions, in tons.
2. The permittee shall collect and record the following information each month for emissions units K050, K051, K052, K053, K055 and K056:
 - a. the name and identification number 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 cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emissions from all coatings and cleanup materials employed, in tons; and,
 - h. the rolling, 12-month summation of VOC emissions, in tons.

Issued: 8/28/2007

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 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 emissions units K050, K051, K052, K053, K055 and K056 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 emissions units K050, K051, K052, K053, K055 and K056 in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

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
VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record

Emissions Unit ID: K055

keeping specified in A.III.2.

c. Emissions Limitation

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.

Issued: 8/28/2007

VI. Miscellaneous Requirements

1. The requirements of this permit supercede the requirements of PTI 08-04106 issued December 1, 1999 and represents no increase in emissions.

Issued: 8/28/2007

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 -(K055) - Paper Coater/Laminator No. 268

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01	See B.III and B.IV below.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Vinyl Acetate

TLV (mg/m³): 35,210

Maximum Hourly Emission Rate (lb/hr): 0.6

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Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 74.74

MAGLC ($\mu\text{g}/\text{m}^3$): 838

2. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

IV. Reporting Requirements

1. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

None

VI. Miscellaneous Requirements

45

Avery Dennison/Monarch
DTI Application: 08 04810

Facility ID: 0857090718

Emissions Unit ID: K055

None

Issued: 8/28/2007

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 -(K056) - Paper Coater/Laminator No. 269

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) (Synthetic minor to avoid NSPS 40 CFR 60.442(a))	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)	VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(F) and 3745-31-05(C).
OAC rule 3745-21-09(F)	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.
40 CFR 60.440(b) (40 CFR Part 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations)	See A.I.2.a 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

Issued: 8/28/2007

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).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number 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 total VOC emissions from all coatings employed, in tons; and,
 - e. the rolling, 12-month summation of VOC emissions, in tons.
2. The permittee shall collect and record the following information each month for emissions units K050, K051, K052, K053, K055 and K056:
 - a. the name and identification number 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 cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;

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- g. the total VOC emissions from all coatings and cleanup materials employed, in tons; and,
- h. the rolling, 12-month summation of VOC emissions, in tons.

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 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 emissions units K050, K051, K052, K053, K055 and K056 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 emissions units K050, K051, K052, K053, K055 and K056 in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

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

Emissions Unit ID: K056

VOC emissions from emissions units K050, K051, K052, K053, K055 and K056 shall not exceed 84.12 tons per rolling 12-month period, including cleanup.

Applicable Compliance Method

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

c. Emissions Limitation

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.

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VI. Miscellaneous Requirements

1. The requirements of this permit supercede the requirements of PTI 08-04106 issued December 1, 1999 and represents a 8.58 tons/yr increase in VOC emissions.

Issued: 8/28/2007

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 -(K056) - Paper Coater/Laminator No. 269

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

Issued: 8/28/2007

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 -(P018) - Mold Break Station

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from this emissions unit shall not exceed 7.3 tons per year (TPY), including cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-07(G)(2)	OC emissions from this emissions unit shall not exceed 8 lbs/hr and 40 lbs/day, including cleanup.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

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

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- c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- d. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

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

2. The permittee shall submit annual reports that specify the total OC 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).

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
OC emissions from this emissions unit shall not exceed 8 lbs/hr, including cleanup.

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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

OC emissions from this emissions unit shall not exceed 40 lbs/day, including cleanup.

Issued: 8/28/2007

Applicable Compliance Method

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

c. Emissions Limitation

OC emissions from this emissions unit shall not exceed 7.3 TPY, including cleanup.

Applicable Compliance Method

Compliance with the emissions limitation shall be determined by summing the daily OC emission rates for the year and dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

1. The requirements of this permit supercede the requirements of PTI 08-04343 issued April 2, 2002 and represents no increase in emissions.

Issued: 8/28/2007

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 -(P018) - Mold Break Station

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-114-01	See B.III and B.IV below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lb/hr): 5.42

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 439MAGLC (ug/m³): 4880

2. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

IV. Reporting Requirements

1. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None