



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

12/03/98

CERTIFIED MAIL

06-84-02-0020

RE: Final Chapter 3745-35 Permit To Operate

RJF International Corporation
David W. Smith
BF Goodrich Road
P.O. Box 657
Marietta, OH 45750-0000

Dear David W. Smith

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Southeast District Office at (740) 385-8501

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID 06-84-02-0020

Expiration Date 12/03/03

FINAL ISSUE

This document constitutes issuance for:

RJF International Corporation
BF Goodrich Road
P.O. Box 657
Marietta, OH 45750-0000

of a permit to operate for:

K008 (Emboss 2)
Emboss film, apply color and coating

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. 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 of any emissions unit 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. 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Southeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Schegoldus

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vinyl Coating Line	OAC rule 3745-35-07 OAC rule 3745-21-09(H)(1)	See Additional Terms and Conditions 2.a. 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. **Additional Terms and Conditions**

- 2.a Total annual VOC emissions from the coatings (including inks) and cleanup materials employed in K003-K008, K011, and K012 shall be less than 61.3 tons per year, based on a rolling twelve-month summation.

B. Operational Restrictions

1. In order to ensure federal enforceability of the annual VOC limit for K003-K008, K011, and K012 the permittee shall not exceed the cumulative emission limits below for the first twelve months of operation following the issuance of this permit :

MONTH(S)	CUMULATIVE, ALLOWABLE VOC EMISSIONS (TONS)
1	5.11
1-2	10.22
1-3	15.33
1-4	20.44
1-5	25.55
1-6	30.66
1-7	35.77
1-8	40.88
1-9	45.99
1-10	51.10
1-11	56.21
1-12	61.30

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for K003-K008, K011, and K012 :
 - a. The name and identification of each cleanup material employed.
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating, excluding water and exempt solvents.
 - e. The number of gallons (excluding water and exempt solvents) of each coating employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in tons.
 - g. The rolling 12 - month summation of VOC emissions from all coatings and cleanup materials employed, in tons.
 - h. For the first 12 months of operation following the issuance of this permit, the cumulative VOC emissions from all coatings and cleanup materials employed, in tons.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify any monthly record showing :
 - a. The use of noncomplying coatings (regarding VOC content).
 - b. An exceedence of the cumulative, monthly VOC emission limit.
An exceedence of the rolling 12 - month VOC emission summation limit.

E. Testing Requirements

1. Formulation data per OAC rule 3745-21-10(B) or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.
2. Compliance with the emission limitation of 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, shall be based on the record keeping specified in Section C.1 of this permit.
3. Compliance with the emission limitation of 61.3 tons VOC per year shall be based on the record keeping specified in Section C.1.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), terms and conditions A-F of this permit to operate shall be federally enforceable. The applicant has requested that such restrictions, as specified in OAC rule 3745-35-07(C), be imposed in order to limit the potential to emit.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 06-84-02-0020

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

RJF International Corporation
BF Goodrich Road
P.O. Box 657
Marietta, OH 45750-0000

of a permit to operate for:

K012 (Printer 7)
Rotogravure printer for applying ink and coating to vinyl wallcovering

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. 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 of any emissions unit 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. 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Southeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Schreyer

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vinyl Coating Line	OAC rule 3745-35-07	See Additional Terms and Conditions 2.a.
	NSPS (40 CFR 60.580 Subpart FFF)	VOC content less than 1.0 kilogram VOC per kilogram of coating or ink solids.
	OAC rule 3745-21-09(H)	This rule is less stringent than NSPS (40 CFR 60.580 Subpart FFF).
	OAC rule 3745-31-05 PTI # 06 - 4214	See Additional Terms and Conditions 2.b.

2. Additional Terms and Conditions

- 2.a Total annual VOC emissions from the coatings (including inks) and cleanup materials employed in K003-K008, K011, and K012 shall be less than 61.3 tons per year, based on a rolling twelve-month summation.
- 2.b Total maximum annual VOC emissions from the coatings (including inks) and cleanup materials employed in emissions unit K012 shall be less than 16.8 tons per year, based on a rolling twelve-month summation.

B. Operational Restrictions

1. In order to ensure federal enforceability of the annual VOC limit for K003-K008, K011, and K012 the permittee shall not exceed the cumulative emission limits below for the first twelve months of operation following the issuance of this permit :

MONTH(S)	CUMULATIVE, ALLOWABLE VOC EMISSIONS (TONS)
1	5.11
1-2	10.22
1-3	15.33
1-4	20.44
1-5	25.55
1-6	30.66
1-7	35.77
1-8	40.88
1-9	45.99
1-10	51.10
1-11	56.21
1-12	61.30

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for K003-K008, K011, and K012 :
 - a. The name and identification of each cleanup material employed.
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating, excluding water and exempt solvents.
 - e. The number of gallons (excluding water and exempt solvents) of each coating employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in tons.
 - g. The rolling 12 - month summation of VOC emissions from all coatings and cleanup materials employed, in tons.
 - h. For the first 12 months of operation following the issuance of this permit, the cumulative VOC emissions from all coatings and cleanup materials employed, in tons.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information on a monthly basis for K012:
 - a. The name and identification of each cleanup material employed.
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating and ink in pounds per gallon of coating or ink, excluding water and exempt solvents, and in kilograms per kilogram of coating or ink solids.
 - e. The number of gallons (excluding water and exempt solvents) of each coating and ink employed.
 - f. The total VOC emissions from all coatings, inks and cleanup materials employed, in tons.
 - g. The rolling 12 - month summation of VOC emissions from all coatings, inks and cleanup materials employed, in tons.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify any monthly record showing :
 - a. The use of noncomplying coatings (regarding VOC content).
 - b. An exceedence of the cumulative, monthly VOC emission limit for K003-K008, K011, and K012.
 - c. An exceedence of the rolling 12 - month VOC emission summation limit for K003-K008, K011, and K012.
 - d. An exceedence of the rolling 12 - month VOC emission summation limit for K012.

E. Testing Requirements

1. Formulation data per OAC rule 3745-21-10(B) or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

E. Testing Requirements (continued)

2. Compliance with the emission limitation of 1.0 kilogram VOC per kilogram ink solids shall be based on the record keeping specified in Section C.2 of this permit.
3. Compliance with the emission limitation of 61.3 tons VOC per year shall be based on the record keeping specified in Section C.1.
4. Compliance with the emission limitation of 16.8 tons VOC per year shall be based on the record keeping specified in Section C.2.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), terms and conditions A-F of this permit to operate shall be federally enforceable. The applicant has requested that such restrictions, as specified in OAC rule 3745-35-07(C), be imposed in order to limit their potential to emit.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 06-84-02-0020

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

RJF International Corporation
BF Goodrich Road
P.O. Box 657
Marietta, OH 45750-0000

of a permit to operate for:

K003 (Printer 3)
Rotogravure printer for applying ink and coating to vinyl wallcovering

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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.)

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7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

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OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Hehner

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vinyl Coating Line	OAC rule 3745-35-07 OAC rule 3745-21-09(H)(1)	See Additional Terms and Conditions 2.a. 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

- 2.a Total annual VOC emissions from the coatings (including inks) and cleanup materials employed in K003-K008, K011, and K012 shall be less than 61.3 tons per year, based on a rolling twelve-month summation.

B. Operational Restrictions

1. In order to ensure federal enforceability of the annual VOC limit for K003-K008, K011, and K012 the permittee shall not exceed the cumulative emission limits below for the first twelve months of operation following the issuance of this permit :

MONTH(S)	CUMULATIVE, ALLOWABLE VOC EMISSIONS (TONS)
1	5.11
1-2	10.22
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1-4	20.44
1-5	25.55
1-6	30.66
1-7	35.77
1-8	40.88
1-9	45.99
1-10	51.10
1-11	56.21
1-12	61.30

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for K003-K008, K011, and K012 :
 - a. The name and identification of each cleanup material employed.
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating, excluding water and exempt solvents.
 - e. The number of gallons (excluding water and exempt solvents) of each coating employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in tons.
 - g. The rolling 12 - month summation of VOC emissions from all coatings and cleanup materials employed, in tons.
 - h. For the first 12 months of operation following the issuance of this permit, the cumulative VOC emissions from all coatings and cleanup materials employed, in tons.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify any monthly record showing :
 - a. The use of noncomplying coatings (regarding VOC content).
 - b. An exceedence of the cumulative, monthly VOC emission limit.
 - c. An exceedence of the rolling 12 - month VOC emission summation limit.

E. Testing Requirements

1. Formulation data per OAC rule 3745-21-10(B) or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.
2. Compliance with the emission limitation of 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, shall be based on the record keeping specified in Section C.1 of this permit.
3. Compliance with the emission limitation of 61.3 tons VOC per year shall be based on the record keeping specified in Section C.1.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), terms and conditions A-F of this permit to operate shall be federally enforceable. The applicant has requested that such restrictions, as specified in OAC rule 3745-35-07(C), be imposed in order to limit the potential to emit.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 06-84-02-0020

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for

RJF International Corporation
BF Goodrich Road
P.O. Box 657
Marietta, OH 45750-0000

of a permit to operate for:

K007 (Laminator 2)
Laminate film and fabric, apply coating

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. 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 of any emissions unit 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. 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Southeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vinyl Coating Line	OAC rule 3745-35-07 OAC rule 3745-21-09(H)(1)	See Additional Terms and Conditions 2.a. 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

- 2.a Total annual VOC emissions from the coatings (including inks) and cleanup materials employed in K003-K008, K011, and K012 shall be less than 61.3 tons per year, based on a rolling twelve-month summation.

B. Operational Restrictions

1. In order to ensure federal enforceability of the annual VOC limit for K003-K008, K011, and K012 the permittee shall not exceed the cumulative emission limits below for the first twelve months of operation following the issuance of this permit :

MONTH(S)	CUMULATIVE, ALLOWABLE VOC EMISSIONS (TONS)
1	5.11
1-2	10.22
1-3	15.33
1-4	20.44
1-5	25.55
1-6	30.66
1-7	35.77
1-8	40.88
1-9	45.99
1-10	51.10
1-11	56.21
1-12	61.30

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for K003-K008, K011, and K012 :
 - a. The name and identification of each cleanup material employed.
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating, excluding water and exempt solvents.
 - e. The number of gallons (excluding water and exempt solvents) of each coating employed.

The total VOC emissions from all coatings and cleanup materials employed, in tons.

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

- h. For the first 12 months of operation following the issuance of this permit, the cumulative VOC emissions from all coatings and cleanup materials employed, in tons.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify any monthly record showing :
 - a. The use of noncomplying coatings (regarding VOC content).
 - b. An exceedence of the cumulative, monthly VOC emission limit.
 - c. An exceedence of the rolling 12 - month VOC emission summation limit.

E. Testing Requirements

1. Formulation data per OAC rule 3745-21-10(B) or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.
2. Compliance with the emission limitation of 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, shall be based on the record keeping specified in Section C.1 of this permit.
3. Compliance with the emission limitation of 61.3 tons VOC per year shall be based on the record keeping specified in Section C.1.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), terms and conditions A-F of this permit to operate shall be federally enforceable. The applicant has requested that such restrictions, as specified in OAC rule 3745-35-07(C), be imposed in order to limit the potential to emit.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 06-84-02-0020

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

RJF International Corporation
BF Goodrich Road
P.O. Box 657
Marietta, OH 45750-0000

of a permit to operate for:

K004 (Printer 4)
Rotogravure printer for applying ink and coating to vinyl wallcovering

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. 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 of any emissions unit 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. 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee.. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Southeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Schuyler

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vinyl Coating Line	OAC rule 3745-35-07	See Additional Terms and Conditions 2.a.
	OAC rule 3745-21-09(H)(1)	4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. **Additional Terms and Conditions**

- 2.a Total annual VOC emissions from the coatings (including inks) and cleanup materials employed in K003-K008, K011, and K012 shall be less than 61.3 tons per year, based on a rolling twelve-month summation.

B. Operational Restrictions

1. In order to ensure federal enforceability of the annual VOC limit for K003-K008, K011, and K012 the permittee shall not exceed the cumulative emission limits below for the first twelve months of operation following the issuance of this permit :

MONTH(S)	CUMULATIVE, ALLOWABLE VOC EMISSIONS (TONS)
1	5.11
1-2	10.22
1-3	15.33
1-4	20.44
1-5	25.55
1-6	30.66
1-7	35.77
1-8	40.88
1-9	45.99
1-10	51.10
1-11	56.21
1-12	61.30

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for K003-K008, K011, and K012 :
 - a. The name and identification of each cleanup material employed.
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating, excluding water and exempt solvents.
 - e. The number of gallons (excluding water and exempt solvents) of each coating employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in tons.
 - g. The rolling 12 - month summation of VOC emissions from all coatings and cleanup materials employed, in tons.
 - h. For the first 12 months of operation following the issuance of this permit, the cumulative VOC emissions from all coatings and cleanup materials employed, in tons.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify any monthly record showing :
 - a. The use of noncomplying coatings (regarding VOC content).
 - b. An exceedence of the cumulative, monthly VOC emission limit.
 - c. An exceedence of the rolling 12 - month VOC emission summation limit.

E. Testing Requirements

1. Formulation data per OAC rule 3745-21-10(B) or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.
2. Compliance with the emission limitation of 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, shall be based on the record keeping specified in Section C.1 of this permit.
3. Compliance with the emission limitation of 61.3 tons VOC per year shall be based on the record keeping specified in Section C.1.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), terms and conditions A-F of this permit to operate shall be federally enforceable. The applicant has requested that such restrictions, as specified in OAC rule 3745-35-07(C), be imposed in order to limit the potential to emit.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 06-84-02-0020

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

RJF International Corporation
BF Goodrich Road
P.O. Box 657
Marietta, OH 45750-0000

of a permit to operate for:

K006 (Printer 6)
Rotogravure printer for applying ink and coating to vinyl wallcovering

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. 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 of any emissions unit 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. 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Southeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vinyl Coating Line	OAC rule 3745-35-07 OAC rule 3745-21-09(H)(1)	See Additional Terms and Conditions 2.a. 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. **Additional Terms and Conditions**

- 2.a Total annual VOC emissions from the coatings (including inks) and cleanup materials employed in K003-K008, K011, and K012 shall be less than 61.3 tons per year, based on a rolling twelve-month summation.

B. Operational Restrictions

1. In order to ensure federal enforceability of the annual VOC limit for K003-K008, K011, and K012 the permittee shall not exceed the cumulative emission limits below for the first twelve months of operation following the issuance of this permit :

MONTH(S)	CUMULATIVE, ALLOWABLE VOC EMISSIONS (TONS)
1	5.11
1-2	10.22
1-3	15.33
1-4	20.44
1-5	25.55
1-6	30.66
1-7	35.77
1-8	40.88
1-9	45.99
1-10	51.10
1-11	56.21
1-12	61.30

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for K003-K008, K011, and K012 :
 - a. The name and identification of each cleanup material employed.
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating, excluding water and exempt solvents.
 - e. The number of gallons (excluding water and exempt solvents) of each coating employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in tons.
 - g. The rolling 12 - month summation of VOC emissions from all coatings and cleanup materials employed, in tons.
 - h. For the first 12 months of operation following the issuance of this permit, the cumulative VOC emissions from all coatings and cleanup materials employed, in tons.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify any monthly record showing :
 - a. The use of noncomplying coatings(regarding VOC content).
 - b. An exceedence of the cumulative, monthly VOC emission limit.
 - c. An exceedence of the rolling 12 - month VOC emission summation limit.

E. Testing Requirements

1. Formulation data per OAC rule 3745-21-10(B) or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.
2. Compliance with the emission limitation of 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, shall be based on the record keeping specified in Section C.1 of this permit.
3. Compliance with the emission limitation of 61.3 tons VOC per year shall be based on the record keeping specified in Section C.1.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), terms and conditions A-F of this permit to operate shall be federally enforceable. The applicant has requested that such restrictions, as specified in OAC rule 3745-35-07(C), be imposed in order to limit the potential to emit.



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 06-84-02-0020

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

RJF International Corporation
BF Goodrich Road
P.O. Box 657
Marietta, OH 45750-0000

of a permit to operate for:

K005 (Printer 5)
Rotogravure printer for applying ink and coating to vinyl wallcovering

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. 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 of any emissions unit 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. 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Southeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vinyl Coating Line	OAC rule 3745-35-07 OAC rule 3745-21-09(H)(1)	See Additional Terms and Conditions 2.a. 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents

2. Additional Terms and Conditions

- 2.a Total annual VOC emissions from the coatings (including inks) and cleanup materials employed in K003-K008, K011, and K012 shall be less than 61.3 tons per year, based on a rolling twelve-month summation.

B. Operational Restrictions

1. In order to ensure federal enforceability of the annual VOC limit for K003-K008, K011, and K012 the permittee shall not exceed the cumulative emission limits below for the first twelve months of operation following the issuance of this permit :

MONTH(S)	CUMULATIVE, ALLOWABLE VOC EMISSIONS (TONS)
1	5.11
1-2	10.22
1-3	15.33
1-4	20.44
1-5	25.55
1-6	30.66
1-7	35.77
1-8	40.88
1-9	45.99
1-10	51.10
1-11	56.21
1-12	61.30

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for K003-K008, K011, and K012 :
 - a. The name and identification of each cleanup material employed
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating, excluding water and exempt solvents.
 - e. The number of gallons (excluding water and exempt solvents) of each coating employed.
The total VOC emissions from all coatings and cleanup materials employed, in tons.
 - g. The rolling 12 - month summation of VOC emissions from all coatings and cleanup materials employed, in tons.
 - h. For the first 12 months of operation following the issuance of this permit, the cumulative VOC emissions from all coatings and cleanup materials employed, in tons.
(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify any monthly record showing :
 - a. The use of noncomplying coatings (regarding VOC content).
 - b. An exceedence of the cumulative, monthly VOC emission limit.
 - c. An exceedence of the rolling 12 - month VOC emission summation limit

E. Testing Requirements

1. Formulation data per OAC rule 3745-21-10(B) or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.
2. Compliance with the emission limitation of 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, shall be based on the record keeping specified in Section C.1 of this permit.
3. Compliance with the emission limitation of 61.3 tons VOC per year shall be based on the record keeping specified in Section C.1.

F. Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), terms and conditions A-F of this permit to operate shall be federally enforceable. The applicant has requested that such restrictions, as specified in OAC rule 3745-35-07(C), be imposed in order to limit the potential to emit.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID 06-84-02-0020

Expiration Date 12/03/03

FINAL ISSUE

This document constitutes issuance for:

RJF International Corporation
BF Goodrich Road
P.O. Box 657
Marietta, OH 45750-0000

of a permit to operate for:

K011 (Emboss 3)
Laminate and emboss film, apply color and coating

Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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.)

4. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. 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 of any emissions unit 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. 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 this emissions unit(s) that is (are) served by such control system(s).

7. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permittee. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

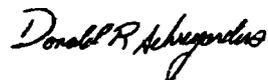
10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Southeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Vinyl Coating Line	OAC rule 3745-35-07	See Additional Terms and Conditions 2.a.
	NSPS (40 CFR 60.580 Subpart FFF)	VOC content less than 1.0 kilogram VOC per kilogram of coating or ink solids.
	OAC rule 3745-21-09(H)	This rule is less stringent than NSPS (40 CFR 60.580 Subpart FFF).
	OAC rule 3745-31-05 PTI # 06 - 2194	See Additional Terms and Conditions 2.b.

2. Additional Terms and Conditions

- 2.a Total annual VOC emissions from the coatings (including inks) and cleanup materials employed in K003-K008, K011, and K012 shall be less than 61.3 tons per year, based on a rolling twelve-month summation.
- 2.b Total maximum annual VOC emissions from the coatings (including inks) and cleanup materials employed in emission unit K011 shall be less than 39 tons per year, based on a rolling twelve-month summation.

B. Operational Restrictions

1. In order to ensure federal enforceability of the annual VOC limit for K003-K008, K011, and K012 the permittee shall not exceed the cumulative emission limits below for the first twelve months of operation following the issuance of this permit :

MONTH(S)	CUMULATIVE, ALLOWABLE VOC EMISSIONS (TONS)
1	5.11
1-2	10.22
1-3	15.33
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1-6	30.66
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1-8	40.88
1-9	45.99
1-10	51.10
1-11	56.21
1-12	61.30

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information on a monthly basis for K003-K008, K011, and K012 :
 - a. The name and identification of each cleanup material employed.
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating, excluding water and exempt solvents.
 - e. The number of gallons (excluding water and exempt solvents) of each coating employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in tons.
 - g. The rolling 12 - month summation of VOC emissions from all coatings and cleanup materials employed, in tons.
 - h. For the first 12 months of operation following the issuance of this permit, the cumulative VOC emissions from all coatings and cleanup materials employed, in tons.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

2. The permittee shall collect and record the following information on a monthly basis for K011:
 - a. The name and identification of each cleanup material employed.
 - b. The VOC content of each cleanup material, in pounds per gallon.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating and ink in pounds per gallon of coating or ink, excluding water and exempt solvents, and in kilograms per kilogram of coating or ink solids.
 - e. The number of gallons (excluding water and exempt solvents) of each coating and ink employed.
 - f. The total VOC emissions from all coatings, inks and cleanup materials employed, in tons.
 - g. The rolling 12 - month summation of VOC emissions from all coatings, inks and cleanup materials employed, in tons.

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify any monthly record showing :
 - a. The use of noncomplying coatings (regarding VOC content).
 - b. An exceedence of the cumulative, monthly VOC emission limit for K003-K008, K011, and K012.
 - c. An exceedence of the rolling 12 - month VOC emission summation limit for K003-K008, K011, and K012.
 - d. An exceedence of the rolling 12 - month VOC emission summation limit for K011.

E. Testing Requirements

1. Formulation data per OAC rule 3745-21-10(B) or USEPA Method 24 shall be used to determine the organic compound or VOC content of the coatings and cleanup materials.

E. Testing Requirements (continued)

2. Compliance with the emission limitation of 1.0 kilogram VOC per kilogram ink solids shall be based on the record keeping specified in Section C.2 of this permit.
3. Compliance with the emission limitation of 61.3 tons VOC per year shall be based on the record keeping specified in Section C.1.
4. Compliance with the emission limitation of 39 tons VOC per year shall be based on the record keeping specified in Section C.2.

F Miscellaneous Requirements

1. Pursuant to OAC rule 3745-35-07(B)(2), terms and conditions A-F of this permit to operate shall be federally enforceable. The applicant has requested that such restrictions, as specified in OAC rule 3745-35-07(C), be imposed in order to limit the potential to emit.