



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

02/23/01

CERTIFIED MAIL

08-19-07-0018

RE: Final Chapter 3745-35 Permit To Operate

Honeywell CPG, Fram Operations
Tim Collette
851 Jackson Street
P.O. Box 100
Greenville, OH 45331

Dear Tim Collette:

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 RAPCA at (937) 225-4435.

Very truly yours,

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

cc: RAPCA
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 2/23/01

Facility ID: 08-19-07-0018

Expiration Date: 2/23/06

FINAL ISSUE

This document constitutes issuance for:

Honeywell CPG, Fram Operations
851 Jackson Street
P.O. Box 100
Greenville, OH 45331

of a permit to operate for:

P014 (Sealing machine)
Darex sealing compound machine (dept 3010)

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 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 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.

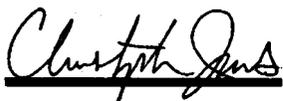
10. The permittee is also subject to the attached special terms and conditions.

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

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

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 RAPCA.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Christopher Jones
Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
Sealing compound machine	OAC rule 3745-35-07	5.84 lbs/day methyl ethyl ketone (MEK); 0.70 TPY MEK, as a rolling, 12-month summation; less than or equal to 1 gallon/day (7.3 lbs) sealant usage;
	OAC rule 3745-21-09(U)(2)(e)	240 gallons (1752 lbs) sealant usage, as a rolling, 12-month summation less stringent than the usage limit established above

2. Additional Terms and Conditions

- The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

- The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
- The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
- The maximum daily sealant usage shall not exceed 1 gallon (7.3 lbs).

B. Operational Restrictions (continued)

4. The annual sealant usage shall not exceed 240 gallons (1752 lbs), as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sealant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Sealant Usage
1	20 gallons (146 lbs)
1 - 2	40 gallons (292 lbs)
1 - 3	60 gallons (438 lbs)
1 - 4	80 gallons (584 lbs)
1 - 5	100 gallons (730 lbs)
1 - 6	120 gallons (876 lbs)
1 - 7	140 gallons (1022 lbs)
1 - 8	160 gallons (1168 lbs)
1 - 9	180 gallons (1314 lbs)
1 - 10	200 gallons (1460 lbs)
1 - 11	220 gallons (1606 lbs)
1 - 12	240 gallons (1752 lbs)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The MEK emissions, in pounds per day.
2. The permittee shall collect and record the following information each month for the sealant machine.
 - a. The total sealant usage for the month, in gallons.
 - b. The total MEK and combined HAPs emissions from all sealants employed, in tons.
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative MEK and total combined HAPs emission rates for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the MEK and total combined HAPs emission rates.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The daily MEK emission limitation.
 - b. The maximum daily sealant usage limitation.
The rolling, 12-month sealant usage limitation
 - d. The rolling, 12-month MEK emission limitation.
 - e. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative sealant usage limitations.

These quarterly deviation (excursion) reports shall be submitted in accordance with paragraph 3 of the General Terms and Conditions.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. 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.
3. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage.
 - b. The MEK emissions for this emissions unit.
 - c. The individual HAP emissions from the facility.
 - d. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation -
5.84 lbs/day MEK

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1
 - 1.b Emission Limitation -
0.70 TPY MEK, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.
 - 1.c Emission Limitation -
1 gallon/day (7.3 lbs) sealant usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
 - 1.d Emission Limitation -
240 gallons/year (1752 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.

E. Testing Requirements (continued)

- 1.e** Emission Limitation -
5.84 lbs VOC/gallon sealant
5.84 lbs MEK/gallon sealant

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in C.1. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.

- 1.f** Emission Limitation -
less than 10 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the individual HAP emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

- 1.g** Emission Limitation -
less than 19.5 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the total combined HAPs emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.
2. The terms and conditions in Sections A through F of this permit are federally enforceable limitations, pursuant to OAC rule 3745-35-07.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 02/23/01

Facility ID: 08-19-07-0018

Expiration Date: 02/23/06

FINAL ISSUE

This document constitutes issuance for:

Honeywell CPG, Fram Operations
851 Jackson Street
P.O. Box 100
Greenville, OH 45331

of a permit to operate for:

P037 (Paper curing oven)
Electric paper curing oven (dept 3086)

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 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 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.

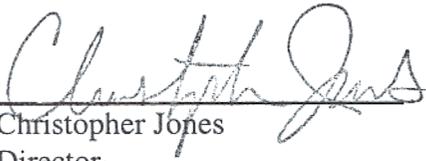
10. The permittee is also subject to the attached special terms and conditions.

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

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

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 RAPCA.

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script, appearing to read "Christopher Jones", written over a horizontal line.

Christopher Jones
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>
Two electric paper curing ovens	OAC rule 3745-31-05(A)(3) PTI 08-2012	0.75 lb/hour, 15 lbs/day, and 2.70 TPY organic compounds from EACH oven;
	OAC rule 3745-17-07(A)(1)	20% opacity, as a 6-minute average, except as provided by rule;
	OAC rule 3745-35-07	0.27 lb/hour, 6.52 lbs/day, and 1.19 TPY phenol from EACH oven; 0.09 lb/hour, 2.28 lbs/day, and 0.42 TPY formaldehyde from EACH oven;
	OAC rule 3745-21-07(G)(1)	0.01 lb/hour, 0.33 lb/day, and 0.06 TPY methanol from EACH oven. The limits based on this rule are less stringent than the limits established above.

2. Additional Terms and Conditions

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

- The maximum hourly paper production rate shall not exceed 271 pounds for each cure oven.
- The maximum daily paper production rate shall not exceed 6516 pounds for each cure oven.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for each cure oven:
 - a. The total pounds of paper cured.
 - b. The total organic compound emission rate, in pounds (see E.1.b. for the calculation methodology).
 - c. The total phenol emission rate, in pounds (see E.1.e. for the calculation methodology).
 - d. The total formaldehyde emission rate, in pounds (see E.1.h. for the calculation methodology).
 - e. The total methanol emission rate, in pounds (see E.1.k. for the calculation methodology).
 - f. The total number of hours of operation.
 - g. The average hourly organic compound emission rate, i.e., (b)/(f), in pounds per hour.
 - h. The average hourly phenol emission rate, i.e., (c)/(f), in pounds per hour.
The average hourly formaldehyde emission rate, i.e., (d)/(f), in pounds per hour.
 - j. The average hourly methanol emission rate, i.e., (e)/(f), in pounds per hour.
2. The permittee shall collect and record the following information each month for each cure oven:
 - a. The total phenol, formaldehyde, methanol, and total combined HAPs emission rates, in tons.
 - b. During the first 12 calendar months following issuance of this permit, the cumulative phenol, formaldehyde, methanol, and total combined HAPs emission rates for each calendar month. Beginning after the first 12 calendar months following issuance of this permit, the rolling, 12-month summation of the phenol, formaldehyde, methanol, and total combined HAPs emission rates.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. an identification of each day during which the average hourly organic compound emission rate exceeded 0.75 pound, the average hourly emission rate of phenol exceeded 0.27 pound, the average hourly emission rate of formaldehyde exceeded 0.09 pound, and/or the average hourly emission rate of methanol exceeded 0.01 pound, and the actual average hourly emission rate for each noncomplying compound for each such day; and
 - b. an identification of each day during which the organic compound emission rate exceeded 15 pounds, the phenol emission rate exceeded 6.52 pounds, the formaldehyde emission rate exceeded 2.28 pounds, and/or the methanol emission rate exceeded 0.33 pound, and the actual emission rate for each noncomplying compound for each such day.

These reports are due by the date prescribed in paragraph 3 of the General Terms and Conditions of this permit.

D. Reporting Requirements (continued)

2. The permittee shall also submit annual reports which specify the following:
 - a. The organic compound emissions for this emissions unit.
 - b. The phenol emissions for this emissions unit.
 - c. The formaldehyde emissions for this emissions unit.
 - d. The methanol emissions for this emissions unit.
 - e. The individual HAP emissions from the facility.
 - f. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation -
0.75 lb/hour organic compounds

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18 or 25.

- 1.b Emission Limitation -
15 lbs/day organic compounds

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be calculated using the following equation:

$$\text{lbs OC/day} = (\text{lbs paper produced/day}) \times (0.0014 \text{ lb OC/lb paper})$$

The 0.0014 lb OC/lb paper value was obtained from the manufacturer's data. The OC content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

- 1.c Emission Limitation -
2.74 TPY organic compounds

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be the sum of the daily organic compound emission rates for the calendar year divided by 2,000 pounds per ton.

- 1.d Emission Limitation -
0.27 lb/hour phenol

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18.

E. Testing Requirements (continued)

- 1.e** Emission Limitation -
6.52 lbs/day phenol

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be calculated using the following equation:

$$\text{lbs phenol/day} = (\text{lbs paper produced/day}) \times (0.001 \text{ lb phenol/lb paper})$$

The 0.001 lb phenol/lb paper value was obtained from the manufacturer's data. The phenol content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

- 1.f** Emission Limitation -
3.45 TPY phenol

Applicable Compliance Method -

Compliance shall be based on the record keeping as specified in C.1. and shall be the sum of the daily phenol emission rates for the calendar year divided by 2,000 pounds per ton.

- 1.g** Emission Limitation -
0.09 lb/hour formaldehyde

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18.

- 1.h** Emission Limitation -
2.28 lbs/day formaldehyde

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be the calculated using the following equation:

$$\text{lbs formaldehyde/day} = (\text{lbs paper produced/day}) \times (0.00035 \text{ lb formaldehyde/lb paper})$$

The 0.00035 lb formaldehyde/lb paper value was obtained from the manufacturer's data. The formaldehyde content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

- 1.i** Emission Limitation -
1.15 TPY formaldehyde

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be the sum of the daily formaldehyde emission rates for the calendar year divided by 2,000 pounds per ton.

- 1.j** Emission Limitation -
0.01 lb/hour methanol

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18.

- 2.** The permittee is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
- 3.** Equivalent types of paper are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the company's FESOP application. The permittee shall notify the Director (the appropriate Ohio EPA District Office) if the permittee uses an equivalent type of paper.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

02/23/01

CERTIFIED MAIL

08-19-07-0018
Honeywell CPG, Fram Operations
Tim Collette
851 Jackson Street
P.O. Box 100
Greenville, OH 45331

RE: Final Chapter 3745-35 Permit To Operate

Dear Tim Collette

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 RAPCA at (937) 225-4435

Very truly yours,

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

cc: RAPCA

Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 2/23/01

Facility ID: 08-19-07-0018

Expiration Date: 2/23/06

FINAL ISSUE

This document constitutes issuance for:

Honeywell CPG, Fram Operations
851 Jackson Street
P.O. Box 100
Greenville, OH 45331

of a permit to operate for:

P038 (Sealing machine #2)
Sealing compound machine #2 (dept 3018)

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 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 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.

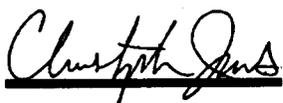
10. The permittee is also subject to the attached special terms and conditions.

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

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

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 RAPCA.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Christopher Jones
Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
Sealing compound machine No. 2	OAC rule 3745-31-05(A)(3) PTI 08-1999 OAC rule 3745-35-07	3.2 lbs/hour volatile organic compounds (VOC); 1.46 TPY VOC, as a rolling, 12-month summation; 11.68 lbs/day methyl ethyl ketone (MEK); 1.46 TPY MEK, as a rolling, 12-month summation; less than or equal to 2 gallons/day (14.6 lbs) sealant usage; 500 gallons (3650 lbs) sealant usage, as a rolling, 12-month summation OAC rule 3745-21-09(U)(2)(e) less stringent than the usage limit established above

2. Additional Terms and Conditions

- The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

- The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
- The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
- The maximum daily sealant usage shall not exceed 2 gallons (14.6 lbs).

B. Operational Restrictions (continued)

4. The annual sealant usage shall not exceed 500 gallons (3650 lbs), as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sealant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Sealant Usage
1	42 gallons (307 lbs)
1 - 2	83 gallons (606 lbs)
1 - 3	125 gallons (912 lbs)
1 - 4	167 gallons (1219 lbs)
1 - 5	208 gallons (1518 lbs)
1 - 6	250 gallons (1825 lbs)
1 - 7	292 gallons (2132 lbs)
1 - 8	333 gallons (2431 lbs)
1 - 9	375 gallons (2738 lbs)
1 - 10	417 gallons (3044 lbs)
1 - 11	458 gallons (3343 lbs)
1 - 12	500 gallons (3650 lbs)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:
- a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC and MEK emissions, in pounds per day.

The total number of hours the emissions unit was in operation.

- g. The average hourly VOC emission rate, i.e., (e)/(f), in pounds per hour.

2. The permittee shall collect and record the following information each month for the sealant machine.

- a. The total sealant usage for the month, in gallons.
- b. The total VOC, MEK, and total combined HAPs emissions from all sealants employed, in tons.
- c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
- d. During the first 12 calendar months following the issuance of this permit, the cumulative VOC, MEK, and total combined HAPs emission rates for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC, MEK, and total combined HAPs emission rates.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The hourly VOC emission limitation.
 - b. The daily MEK emission limitation.
 - c. The maximum daily sealant usage limitation.
 - d. The rolling, 12-month sealant usage limitation.
 - e. The rolling, 12-month VOC and MEK emission limitations.
 - f. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative sealant usage limitations.

These quarterly deviation (excursion) reports shall be submitted in accordance with paragraph 3 of the General Terms and Conditions.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. 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.
3. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage.
 - b. The VOC emissions for this emissions unit.
The MEK emissions for this emissions unit.
 - d. The individual HAP emissions from the facility.
 - e. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation -
3.2 lb/hour VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1

Emission Limitation -
1.46 TPY MEK, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.

Emission Limitation -
11.68 lbs/day MEK

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1

E. Testing Requirements (continued)

- 1.d** Emission Limitation -
1.46 TPY MEK, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.

- 1.e** Emission Limitation -
2 gallons/day (14.6 lbs) sealant usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.

- 1.f** Emission Limitation -
500 gallons/year (3650 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.

- 1.g** Emission Limitation -
5.84 lbs VOC/gallon sealant
5.84 lbs MEK/gallon sealant

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in C.1. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.

- 1.h** Emission Limitation -
less than 10 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the individual HAP emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

- 1** Emission Limitation -
less than 19.5 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the total combined HAPs emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.
2. The terms and conditions in Sections A through F of this permit are federally enforceable limitations, pursuant to OAC rule 3745-35-07.



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 2/23/01

Facility ID: 08-19-07-0018

Expiration Date: 2/23/06

FINAL ISSUE

This document constitutes issuance for:

Honeywell CPG, Fram Operations
851 Jackson Street
P.O. Box 100
Greenville, OH 45331

of a permit to operate for:

P031 (Sealing machine #1)
Sealing compound machine #1 (dept 3010)

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 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 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.

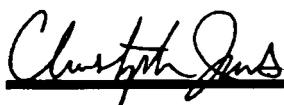
10. The permittee is also subject to the attached special terms and conditions.

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

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

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 RAPCA.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Christopher Jones
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>
Sealing compound machine No. 1	OAC rule 3745-31-05(A)(3) PTI 08-2195	1.0 lb/hour and 8.0 lbs/day volatile organic compounds (VOC); 1.0 TPY VOC, as a rolling, 12-month summation; 8.0 lbs/day methyl ethyl ketone (MEK); 1.0 TPY MEK, as a rolling, 12-month summation;
	OAC rule 3745-35-07	less than or equal to 1.37 gallons/day (10 lbs) sealant usage; 342 gallons (2526 lbs) sealant usage, as a rolling, 12-month summation
	OAC rule 3745-21-09(U)(2)(e)	less stringent than the usage limit established above

2. Additional Terms and Conditions

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

1. The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
2. The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
3. The maximum daily sealant usage shall not exceed 1.37 gallons (10 lbs).

B. Operational Restrictions (continued)

4. The annual sealant usage shall not exceed 342 gallons (2497 lbs), as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sealant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Sealant Usage
1	29 gallons (212 lbs)
1 - 2	57 gallons (416 lbs)
1 - 3	86 gallons (628 lbs)
1 - 4	114 gallons (832 lbs)
1 - 5	143 gallons (1044 lbs)
1 - 6	171 gallons (1248 lbs)
1 - 7	200 gallons (1460 lbs)
1 - 8	228 gallons (1664 lbs)
1 - 9	257 gallons (1876 lbs)
1 - 10	285 gallons (2081 lbs)
1 - 11	314 gallons (2292 lbs)
1 - 12	342 gallons (2497 lbs)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC and MEK emissions, in pounds per day.
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly VOC emission rate, i.e., (e)/(f), in pounds per hour.
2. The permittee shall collect and record the following information each month for the sealant machine.
 - a. The total sealant usage for the month, in gallons.
 - b. The total VOC, MEK, and total combined HAPs emissions from all sealants employed, in tons.
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative VOC, MEK, and total combined HAPs emission rate for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC, MEK, and total combined HAPs emission rates.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The hourly VOC emission limitation.
 - b. The daily VOC and MEK emission limitations.
 - c. The maximum daily sealant usage limitation.
 - d. The rolling, 12-month sealant usage limitation
 - e. The rolling, 12-month VOC and MEK emission limitation.
 - f. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative sealant usage limitations.

These quarterly deviation (excursion) reports shall be submitted in accordance with paragraph 3 of the General Terms and Conditions.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. 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.
3. The permittee shall also submit annual reports which specify the following:
 - a. The total sealant usage.
 - b. The VOC emissions for this emissions unit.
 - c. The MEK emissions for this emissions unit.
 - d. The individual HAP emissions from the facility.
 - e. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation -
1.0 lb/hour VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.
 - 1.b Emission Limitation -
8.0 lbs/day VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1
 - 1.c Emission Limitation -
1.0 TPY VOC, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.

E. Testing Requirements (continued)

- 1.d** Emission Limitation -
8.0 lbs/day MEK

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1

- 1.e** Emission Limitation -
1.0 TPY MEK, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2.

- 1.f** Emission Limitation -
1.38 gallons/day (10 lbs) sealant usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.

- 1.g** Emission Limitation -
346 gallons/year (2526 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2

- 1.h** Emission Limitation -
5.86 lbs VOC/gallon sealant
5.86 lbs MEK/gallon sealant

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in C.1. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data

- 1** Emission Limitation -
less than 10 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the individual HAP emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

- 1.** Emission Limitation -
less than 19.5 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the total combined HAPs emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.

F. Miscellaneous Requirements (continued)

2. The terms and conditions in Sections A through F of this permit are federally enforceable limitations, pursuant to OAC rule 3745-35-07.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 02/23/01

Facility ID: 08-19-07-0018

Expiration Date: 02/23/06

FINAL ISSUE

This document constitutes issuance for:

Honeywell CPG, Fram Operations
851 Jackson Street
P.O. Box 100
Greenville, OH 45331

of a permit to operate for:

P036 (Paper curing oven)
Electric paper curing oven (dept 3029)

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 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 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.

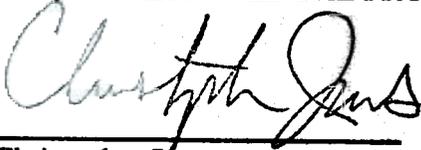
10. The permittee is also subject to the attached special terms and conditions.

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

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

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 RAPCA.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Christopher Jones
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>
Two electric paper curing ovens	OAC rule 3745-31-05(A)(3) PTI 08-2012	0.75 lb/hour, 15 lbs/day, and 2.70 TPY organic compounds from EACH oven;
	OAC rule 3745-17-07(A)(1)	20% opacity, as a 6-minute average, except as provided by rule;
	OAC rule 3745-35-07	0.27 lb/hour, 6.52 lbs/day, and 1.19 TPY phenol from EACH oven;
		0.09 lb/hour, 2.28 lbs/day, and 0.42 TPY formaldehyde from EACH oven;
		0.01 lb/hour, 0.33 lb/day, and 0.06 TPY methanol from EACH oven.
	OAC rule 3745-21-07(G)(1)	The limits based on this rule are less stringent than the limits established above.

2. Additional Terms and Conditions

- 2.a The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

- The maximum hourly paper production rate shall not exceed 271 pounds for each cure oven
- The maximum daily paper production rate shall not exceed 6516 pounds for each cure oven.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for each cure oven:
 - a. The total pounds of paper cured.
 - b. The total organic compound emission rate, in pounds (see E.1.b. for the calculation methodology).
 - c. The total phenol emission rate, in pounds (see E.1.e. for the calculation methodology).
 - d. The total formaldehyde emission rate, in pounds (see E.1.h. for the calculation methodology).
 - e. The total methanol emission rate, in pounds (see E.1.k. for the calculation methodology).
 - f. The total number of hours of operation.
 - g. The average hourly organic compound emission rate, i.e., (b)/(f), in pounds per hour.
 - h. The average hourly phenol emission rate, i.e., (c)/(f), in pounds per hour.
The average hourly formaldehyde emission rate, i.e., (d)/(f), in pounds per hour.
 - j. The average hourly methanol emission rate, i.e., (e)/(f), in pounds per hour.
2. The permittee shall collect and record the following information each month for each cure oven:
 - a. The total phenol, formaldehyde, methanol, and total combined HAPs emission rates, in tons.
 - b. During the first 12 calendar months following issuance of this permit, the cumulative phenol, formaldehyde, methanol, and total combined HAPs emission rates for each calendar month. Beginning after the first 12 calendar months following issuance of this permit, the rolling, 12-month summation of the phenol, formaldehyde, methanol, and total combined HAPs emission rates.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following:
 - a. an identification of each day during which the average hourly organic compound emission rate exceeded 0.75 pound, the average hourly emission rate of phenol exceeded 0.27 pound, the average hourly emission rate of formaldehyde exceeded 0.09 pound, and/or the average hourly emission rate of methanol exceeded 0.01 pound, and the actual average hourly emission rate for each noncomplying compound for each such day; and
 - b. an identification of each day during which the organic compound emission rate exceeded 15 pounds, the phenol emission rate exceeded 6.52 pounds, the formaldehyde emission rate exceeded 2.28 pounds, and/or the methanol emission rate exceeded 0.33 pound, and the actual emission rate for each noncomplying compound for each such day.

These reports are due by the date prescribed in paragraph 3 of the General Terms and Conditions of this permit.

D. Reporting Requirements (continued)

2. The permittee shall also submit annual reports which specify the following:
- a. The organic compound emissions for this emissions unit
 - b. The phenol emissions for this emissions unit
 - c. The formaldehyde emissions for this emissions unit.
 - d. The methanol emissions for this emissions unit
 - e. The individual HAP emissions from the facility

The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation -
0.75 lb/hour organic compounds

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Methods 18 or 25.

- 1.b Emission Limitation -
15 lbs/day organic compounds

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be calculated using the following equation:

$$\text{lbs OC/day} = (\text{lbs paper produced/day}) \times (0.0014 \text{ lb OC/lb paper})$$

The 0.0014 lb OC/lb paper value was obtained from the manufacturer's data. The OC content emission factor is subject to revision, if necessary, based upon results of any stack tests performed.

- 1.c Emission Limitation -
2.74 TPY organic compounds

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be the sum of the daily organic compound emission rates for the calendar year divided by 2,000 pounds per ton.

- 1.d Emission Limitation -
0.27 lb/hour phenol

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. If required, compliance shall be based upon stack testing, performed in accordance with USEPA Reference Method 18.

E. Testing Requirements (continued)

- 1.e** Emission Limitation -
6.52 lbs/day phenol

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be calculated using the following equation:

$$\text{lbs phenol/day} = (\text{lbs paper produced/day}) \times (0.001 \text{ lb phenol/lb paper})$$

The 0.001 lb phenol/lb paper value was obtained from the manufacturer's data. The phenol content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

- 1.f** Emission Limitation -
3.45 TPY phenol

Applicable Compliance Method -

Compliance shall be based on the record keeping as specified in C.1. and shall be the sum of the daily phenol emission rates for the calendar year divided by 2,000 pounds per ton.

- 1.g** Emission Limitation -
0.09 lb/hour formaldehyde

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18.

- 1.h** Emission Limitation -
2.28 lbs/day formaldehyde

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be the calculated using the following equation:

$$\text{lbs formaldehyde/day} = (\text{lbs paper produced/day}) \times (0.00035 \text{ lb formaldehyde/lb paper})$$

The 0.00035 lb formaldehyde/lb paper value was obtained from the manufacturer's data. The formaldehyde content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

- 1.i** Emission Limitation -
1.15 TPY formaldehyde

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be the sum of the daily formaldehyde emission rates for the calendar year divided by 2,000 pounds per ton.

- 1.j** Emission Limitation -
0.01 lb/hour methanol

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18.

E. Testing Requirements (continued)

- 1.k** Emission Limitation -
0.33 lb/day methanol

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be calculated using the following equation:

$$\text{lbs methanol/day} = (\text{lbs paper produced/day}) \times (0.00005 \text{ lb methanol/lb paper})$$

The 0.00005 lb methanol/lb paper value was obtained from the manufacturer's data. The methanol content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

- 1.l** Emission Limitation -
0.88 TPY methanol

Applicable Compliance Method -

Compliance shall be based upon the record keeping as specified in C.1. and shall be the sum of the daily methanol emission rates for the calendar year divided by 2,000 pounds per ton.

- 1.m** Emission Limitation -
less than 10 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the individual HAP emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

- 1.n** Emission Limitation -
less than 19.5 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P041, P047, P048, and P049 and shall be the sum of the total combined HAPs emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. The terms and conditions in Sections A through F of this permit are federally enforceable limitations, pursuant to OAC rule 3745-35-07.
2. The permittee is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
3. Equivalent types of paper are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the company's FESOP application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of paper.



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 2/23/01

Facility ID: 08-19-07-0018

Expiration Date: 2/23/06

FINAL ISSUE

This document constitutes issuance for:

Honeywell CPG, Fram Operations
851 Jackson Street
P.O. Box 100
Greenville, OH 45331

of a permit to operate for:

P041 (Sealing machine #6)
Sealing compound machine #6 (dept 3010)

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 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 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:

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

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 RAPCA.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Christopher Jones
Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
Sealing compound machine No. 6	OAC rule 3745-31-05(A)(3) PTI 08-2426	1.27 lbs/hour, 27.94 lbs/day volatile organic compounds (VOC);
		3.5 TPY VOC, as a rolling, 12-month summation;
	OAC rule 3745-35-07	27.94 lbs/day methyl ethyl ketone (MEK);
		3.5 TPY MEK, as a rolling, 12-month summation;
		less than or equal to 4.78 gallons/day (35 lbs) sealant usage;
		1199 gallons (8753 lbs) sealant usage, as a rolling, 12-month summation
	OAC rule 3745-21-09(U)(2)(e)	less stringent than the usage limit established above

2. Additional Terms and Conditions

- The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 19.5 TPY for any combination of HAPs, based upon rolling, 12-month summations.

B. Operational Restrictions

- The maximum VOC content of all sealants employed in this emissions unit shall not exceed 5.84 lbs VOC/gallon.
- The maximum MEK content of all sealants employed in this emissions unit shall not exceed 5.84 lbs MEK/gallon.
- The maximum daily sealant usage shall not exceed 4.78 gallons (35 lbs).

B. Operational Restrictions (continued)

4. The annual sealant usage shall not exceed 1199 gallons (8753 lbs), as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the sealant usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Sealant Usage
	100 gallons (730 lbs)
1 - 2	200 gallons (1460 lbs)
1 - 3	300 gallons (2190 lbs)
1 - 4	400 gallons (2920 lbs)
1 - 5	500 gallons (3650 lbs)
1 - 6	600 gallons (4380 lbs)
1 - 7	699 gallons (5103 lbs)
1 - 8	799 gallons (5833 lbs)
1 - 9	899 gallons (6563 lbs)
1 - 10	999 gallons (7293 lbs)
1 - 11	1099 gallons (8023 lbs)
1 - 12	1199 gallons (8753 lbs)

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual sealant usage limitation based upon rolling, 12-month summations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the sealant machine:
 - a. The name and identification of each sealant employed.
 - b. The volume, in gallons, of each sealant employed.
 - c. The total volume, in gallons, of all sealants employed.
 - d. The VOC and MEK content of each sealant, as applied, in pounds per gallon.
 - e. The VOC and MEK emissions, in pounds per day.
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly VOC emission rate, i.e., (e)/(f), in pounds per hour.
2. The permittee shall collect and record the following information each month for the sealant machine.
 - a. The total sealant usage for the month, in gallons.
 - b. The total VOC, MEK, and total combined HAPs emissions from all sealants employed, in tons.
 - c. During the first 12 calendar months following the issuance of this permit, the cumulative sealant usage for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the sealant usage figures.
 - d. During the first 12 calendar months following the issuance of this permit, the cumulative VOC, MEK, and total combined HAPs emission rates for each calendar month. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the VOC, MEK, and total combined HAPs emission rates.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The hourly VOC emission limitation.
 - b. The daily VOC and MEK emission limitations.
 - c. The maximum daily sealant usage limitation
 - d. The rolling, 12-month sealant usage limitation
 - e. The rolling, 12-month VOC and MEK emission limitations
 - f. For the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative sealant usage limitations.

These quarterly deviation (excursion) reports shall be submitted in accordance with paragraph 3 of the General Terms and Conditions.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of sealants with VOC and/or MEK contents greater than the above-specified limitations. 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.
3. The permittee shall also submit annual reports which specify the following
 - a. The total sealant usage
 - b. The VOC emissions for this emissions unit.
 - c. The MEK emissions for this emissions unit
 - d. The individual HAP emissions from the facility.
 - e. The total combined HAPs emissions from the facility.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation -
1.27 lbs/hour VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1

Emission Limitation -
27.94 lbs/day VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1
 - 1.c Emission Limitation -
3.5 TPY VOC, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.

E. Testing Requirements (continued)

- 1.d Emission Limitation -
27.94 lbs/day MEK

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1

- 1.e Emission Limitation -
3.5 TPY MEK, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2

- 1.f Emission Limitation -
4.78 gallons/day (35 lbs) sealant usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.1.

- 1.g Emission Limitation -
1199 gallons/year (8753 lbs) sealant usage, as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in C.2

- 1.h Emission Limitation -
5.84 lbs VOC/gallon sealant
5.84 lbs MEK/gallon sealant

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in C.1. USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The MEK content of each material employed shall be based upon formulation data.

- 1.i Emission Limitation -
less than 10 TPY of any individual HAP from this facility as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the individual HAP emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

1. Emission Limitation -
less than 19.5 TPY of total combined HAPs from this facility as a rolling, 12-month summation

Applicable Compliance Method -
Compliance shall be based upon the monthly record keeping for emissions units P014, P031, P036, P037, P038, P041, P047, P048, and P049 and shall be the sum of the total combined HAPs emissions for the entire facility for the rolling, 12-month period. The HAP content of each material employed shall be based upon formulation data.

F. Miscellaneous Requirements

1. Equivalent types of sealants are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates, do not exceed that which is represented by this federally enforceable State operating permit and the data presented in the corresponding application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of sealant.

F. Miscellaneous Requirements (continued)

2. The terms and conditions in Sections A through F of this permit are federally enforceable limitations, pursuant to OAC rule 3745-35-07.