

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

12/26/2013

Certified Mail

Mr. Michael Skladany
Ritrama Duramark
341 Eddy Road
Cleveland, OH 44108

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318007355
Permit Number: P0115466
Permit Type: Renewal
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

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

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Ritrama Duramark**

Facility ID:	1318007355
Permit Number:	P0115466
Permit Type:	Renewal
Issued:	12/26/2013
Effective:	12/26/2013
Expiration:	12/26/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
Ritrama Duramark

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Final Permit-to-Install and Operate
Ritrama Duramark
Permit Number: P0115466
Facility ID: 1318007355
Effective Date: 12/26/2013

Authorization

Facility ID: 1318007355
Application Number(s): A0048884
Permit Number: P0115466
Permit Description: FEPTIO renewal permit for a adhesive coating line (K003) and a vinyl organisol casting line (K004) both routed through a regenerative thermal oxidizer (RTO). PTI 13-04075 for K003 issued 7/24/03. PTI 13-04262 for K004 issued 11/1/05.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/26/2013
Effective Date: 12/26/2013
Expiration Date: 12/26/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

RitramaDuramark
341 EDDY RD.
CLEVELAND, OH 44108

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

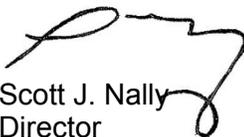
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0115466

Permit Description: FEPTIO renewal permit for a adhesive coating line (K003) and a vinyl organisol casting line (K004) both routed through a regenerative thermal oxidizer (RTO). PTI 13-04075 for K003 issued 7/24/03. PTI 13-04262 for K004 issued 11/1/05.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

K003

Adhesive Coating Line #2 with Oven
13-04075
Not Applicable

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

K004

Cast Vinyl Coating Line
13-04262
Not Applicable



Final Permit-to-Install and Operate
Ritrama Duramark
Permit Number: P0115466
Facility ID: 1318007355
Effective Date: 12/26/2013

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
Ritrama Duramark
Permit Number: P0115466
Facility ID: 1318007355
Effective Date: 12/26/2013

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Ritrama Duramark

Permit Number: P0115466

Facility ID: 1318007355

Effective Date: 12/26/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2
2. The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs facility wide (i.e., K003, K004, and P001).



Final Permit-to-Install and Operate

Ritrama Duramark

Permit Number: P0115466

Facility ID: 1318007355

Effective Date: 12/26/2013

C. Emissions Unit Terms and Conditions



1. K003, Adhesive Coating Line #2 with Oven

Operations, Property and/or Equipment Description:

Adhesive coating line on silicone coated paper with a 3 zone drying oven and vented to a regenerative thermal oxidizer.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-04075 issued 7/24/03	Volatile Organic Compound (VOC) emissions from coating shall not exceed 24 lbs/hr and 72 tpy. VOC emissions from cleanup shall not exceed 6 TPY. See b)(2)b. below.
b.	OAC rule 3745-21-09(F)(2)	See b)(2)c. below.
c.	OAC rule 3745-21-09(B)(6)	The capture and control requirements specified by this rule are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	See b)(2)a., b)(2)b., c)(1) and c)(2) below.

(2) Additional Terms and Conditions

- a. The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons /year for any single HAP and 24.9 tons/year for any combination of HAPs facility wide (i.e., K003, K004, and P001). VOC emissions are restricted to 78 tons/year for K003. Compliance with the above limitations shall be based on a rolling, 12-month summation.
- b. The permittee shall provide a capture and control efficiency of no less than 95% and shall achieve a control efficiency of not less than 96% by weight to control emissions generated by the application of the coatings.
- c. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in OAC rule 3745-21-09(F)(2), the permittee shall comply with the capture and control requirements established as BAT in b)(2)b. above.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 6000, based upon a rolling, 12-month summation of the operating hours. This operating hours restriction will limit the maximum single HAP emissions to 9.9 tons and combined HAP emissions to 24.9 tons facility wide, and the VOC emissions to 78 tons per rolling, 12-month period for K003.
- (2) Maintain and operate a regenerative thermal oxidizer (RTO) as follows:
 - a. The permittee shall employ a capture and control system which shall capture not less than 99%, by weight, of all VOC emissions from this emission unit.
 - b. The permittee shall employ a control system which shall destroy not less than 96%, by weight, of the VOC emissions captured.
- (3) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating as applied;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of hours of operation;
 - d. the amount, in gallons, of each coating employed;
 - e. the daily VOC emission rate determined by summing (b x d) for each coating employed and then multiplying by (1 - the capture & control efficiency) from the most recent stack test which demonstrated compliance;
 - f. the average hourly emission rate in pounds per hour (e/c);
 - g. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating , as applied;
 - h. the total combined Hazardous Air Pollutant (HAP) content for each coating in pounds of combined HAPs per gallon of coating , as applied (sum all the individual HAP contents from g);
 - i. the name and identification of each cleanup material employed;
 - j. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - k. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied; and
 - l. the amount, in gallons, of each cleanup material employed.
- (2) The permittee shall maintain monthly records of the total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period. For each HAP, the sum of d)(1)d. times d)(1)g. for each coating multiplied by [(1 - the capture and control efficiency) from the most recent performance test which demonstrated compliance] plus the sum of d)(1)j. times d)(1)l. for each cleanup material.
- (3) The permittee shall maintain monthly records of the total combined Hazardous Air Pollutant emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling , 12-month period. The combined HAP emissions shall be determined by the sum of d)(1)d. times d)(1)h. for each coating multiplied by (1 - the capture and control efficiency) from the most recent performance test which demonstrated compliance plus the sum of d)(1)k. times d)(1)l. for each cleanup material.



- (4) The permittee shall maintain monthly records of the rolling, 12-month summation of VOC emissions determined by summing the daily emissions for coatings and cleanup from d)(1)e. above and adding the emissions due to cleanup determined by summing d)(1)b. times d)(1)l. for all cleanup materials.
- (5) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) combustion temperature within the thermal oxidizer when the emission unit is in operation. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee. The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees celsius or ± 2.5 degrees celsius.
- (6) The permittee shall collect and record the following information each day for the control equipment when this emissions unit is in operation:
 - a. a log of downtime time for the capture system, control device, and monitoring equipment, while the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature within the thermal oxidizer, was 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
- (7) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the cumulative operating hours for each calendar month. (i.e. rolling, 12-month summation of the operating hours).
- (8) The permit to install for this emissions unit (K003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1- hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3):188,000

Maximum Hourly Emission Rate (lbs/hr): 24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83.3

MAGLC (ug/m3): 4,486



Pollutant: n-Hexane

TLV (ug/m3):176,000

Maximum Hourly Emission Rate (lbs/hr): 24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 81.4

MAGLC (ug/m3): 4,190

(9) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

(10) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.



e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall include with the annual PER the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission limit; and
 - b. all 3 - hour blocks of time when the emissions unit was in operation during which the average temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
- (4) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period. This is the combined total individual HAP for all emissions units at this facility (K003, K004, and P001);
 - ii. the total combined HAP emissions limitation from all coatings and cleanup materials employed, in pounds or tons per rolling, 12- month period. This is the combined total HAPs for all emissions units at this facility (K003, K004, and P001);



- iii. exceedances of the rolling, 12-month summation of the operating hours limitation. This is for K003 only;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Individual HAP emissions shall not exceed 9.9 tpy facility wide based upon a rolling 12-month summation, and combination HAPs emission shall not exceed 24.9 tpy based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the emissions limitations shall be determined pursuant to the record keeping requirements contained in d) of this permit.

- b. Emission Limitation:

24 lbs/hr and 72 tpy VOC, based upon a rolling, 12-month summation, for coating application.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements contained in d) of this permit.

- c. Emission Limitation:

6 TPY VOC from cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements contained in d) of this permit.



- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months of the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture and destruction efficiency limitation for VOC emissions and the allowable hourly VOC mass rate of emissions.
 - c. Method 25 or 25A of 40 CFR Part 60, Appendix A, shall be employed to demonstrate compliance with the allowable mass emission rate and the destruction efficiency. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The Cleveland DAQ will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.
 - d. The emission tests shall be conducted while the emissions unit is operating at or near its maximum operating capacity, unless otherwise specified or approved by Cleveland DAQ.
 - e. The destruction efficiency(i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and U.S.EPA Methods 25 or 25A of 40 CFR Part 60, Appendix A. Formulation data from the manufacturer, or if required Method 24A, shall be used to determine VOC contents of the coatings. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of the interfering gases; and
 - f. The results of the performance test shall be converted to pounds of VOC per hour from reported pounds of organic carbon per hour (from Method 25 or 25A).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to tests may result in the Cleveland DAQ's refusal to accept the results of this emission tests.



Final Permit-to-Install and Operate

Ritrama Duramark

Permit Number: P0115466

Facility ID: 1318007355

Effective Date: 12/26/2013

Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emission unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or person responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the tests.

g) Miscellaneous Requirements

- (1) None.



2. K004, Cast Vinyl Coating Line

Operations, Property and/or Equipment Description:

Vinyl cast coating line (coating line 1) with oven and controlled by a 6 MMBtu thermal oxidizer (RTO).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) PTI 13-04262 issued 11/1/2005	Volatile Organic Compound (VOC) emissions from coating shall not exceed 6.1 lbs/hr and 15.22 tpy including cleanup material. See b)(2)b. below.
b.	OAC rule 3745-21-09(F)(2)	See b)(2)c. below.
c.	OAC rule 3745-21-09(B)(6)	The capture and control requirements specified by this rule are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05 (A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D)(1)(b) Synthetic Minor to avoid Title V	See b)(2)a., b)(2)b., c)(1), and c)(2) below.
e.	40 CFR 60 subpart RR	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs facility wide (i.e., K003, K004, and P001). VOC emissions are restricted to 15.22 tons per year for K004. Compliance with the above limitations shall be based on a rolling, 12- month summation.
- b. The permittee shall provide a capture and control efficiency (i.e., overall VOC emission reduction) of no less than 97.1% and shall achieve a control efficiency of not less than 97.3% by weight to control emissions generated by the application of the coatings.
- c. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in OAC rule 3745-21-09 (F), the permittee shall comply with the capture and control requirements established as BAT in b)(2)b. above.

c) Operational Restrictions

- (1) The maximum annual operating hours for this emissions unit shall not exceed 4992, based upon a rolling , 12-month summation of the operating hours. This operating hours restriction will limit the VOC emissions to 15.22 tons per rolling, 12-month period for K004.
- (2) The permittee shall maintain and operate the regenerative thermal oxidizer (RTO) as follows:
 - a. the permittee shall employ a capture system which shall capture not less than 99.8%, by weight, of all VOC emissions from the emission unit; and
 - b. the permittee shall employ a control system which shall destroy not less than 97.3%, by weight, of the VOC emission captured.



- (3) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating as applied;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of hours of operation;
 - d. the amount, in gallons, of each coating and cleanup material employed;
 - e. the daily VOC emission rate determined by summing (b x d) for each coating and cleanup employed and then multiplying by (1 - the capture & control efficiency) from the most recent stack test which demonstrated compliance;
 - f. the average hourly emission rate in pounds per hour (e/c);
 - g. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating , as applied;
 - h. the total combined Hazardous Air Pollutant (HAP) content for each coating in pounds of combined HAPs per gallon of coating , as applied (sum all the individual HAP contents from g);
 - i. the name and identification of each cleanup material employed;
 - j. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied; and
 - k. the total combined HAP content of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
- (2) The permittee shall maintain monthly records of the total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period. For each HAP, the sum of d)(1)d. times d)(1)g. for each coating multiplied by [(1 - the capture and control efficiency) from the most recent performance test which demonstrated compliance] plus the sum of d)(1)j. times d)(1)d. for each cleanup material, multiplied by (1 - the capture and control efficiency).
- (3) The permittee shall maintain monthly records of the total combined Hazardous Air Pollutant emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling , 12-month period. The combined HAP emissions shall be determined by the sum of d)(1)d. times d)(1)h. for each coating



multiplied by (1 - the capture and control efficiency) from the most recent performance test which demonstrated compliance plus the sum of d)(1)k. times d)(1)d. for each cleanup material, multiplied by (1- the capture and control efficiency).

- (4) The permittee shall maintain monthly records of the rolling, 12-month summation of VOC emissions determined by summing the daily emissions for coatings and cleanup from d)(1)e. above.
 - (5) In accordance with 40 CFR 60.443(b), the permittee shall calculate and record for each calendar month the required overall VOC emission reduction as specified in 40 CFR 60.443(b).
 - (6) In accordance with 40 CFR 60.443(d), the permittee shall determine and record calendar monthly compliance with the overall VOC reduction specified in b)(2)b. above by comparing the monthly required overall VOC emission reduction specified in 40 CFR 60.443(b) to the overall VOC emission reduction demonstrated in the most recent performance test which demonstrated compliance with the limits in b)(2)b.. If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the emissions unit is in compliance with the overall VOC reduction from b)(2)b..
 - (7) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) combustion temperature within the thermal oxidizer when the emission unit is in operation. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee. The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees celsius or ± 2.5 degrees celsius.
 - (8) The permittee shall collect and record the following information each day for the control equipment when the emissions unit is in operation:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment and the associated emission unit; and
 - b. the average temperature of the exhaust gases from the thermal incinerator during each of the eight 3-hour blocks of the time during the day.
 - (9) The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the cumulative operating hours for each calendar month. (i.e. rolling, 12-month summation of the operating hours).
- e) Reporting Requirements
- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept



hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall include in the annual PER the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission limit; and
 - b. all 3-hour blocks of time when the emissions unit was in operation during which the average temperature within the thermal oxidizer does not comply with the temperature limitation specified above.
- (4) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period. This is the combined total individual HAP for all emissions units at this facility (K003, K004, and P001);
 - ii. the total combined HAP emissions limitation from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period. This is the combined total HAPs for all emissions units at this facility (K003, K004, and P001);
 - iii. exceedances of the rolling, 12-month summation of the operating hours limitation. This is for K004 only;
 - b. the probable cause of each deviation (excursion);



- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Individual HAPs emissions shall not exceed 9.9 tpy based upon a rolling 12 - month summation, and combination HAPs emission shall not exceed 24.9 tpy based upon a rolling, 12 month summation. The HAP limitations are combined for all emissions units at this facility (K003, K004 and P001).

Applicable Compliance Method:

Compliance with the emissions limitations shall be determined pursuant to the record keeping requirements contained in d) above.

- b. Emission Limitation:

6.1 lbs/hr and 15.22 tpy VOC, based upon a rolling, 12 - month summation, for coating and cleanup application.

Applicable Compliance Method:

Compliance with the emissions limitations shall be determined pursuant to the record keeping requirements contained in d) above.

- c. Emission Limitation:

The permittee shall provide a capture and control efficiency (i.e., overall VOC emission reduction) of no less than 97.1% and shall achieve a control efficiency of not less than 97.3% by weight to control emissions generated by the application of the coatings.

Applicable Compliance Method:

Compliance shall be determined on a calendar monthly basis in accordance with 40 CFR 60.443(d) and the initial performance test requirements specified in 40 CFR 60.444 and 60.446.



- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emissions testing shall be conducted within 18 months of the effective date of this permit (the most recent stack test was conducted in June 2010).
 - b. The emission testing shall be conducted to demonstrate compliance with the capture and destruction efficiency limitation for VOC emissions and the allowable hourly VOC mass rate of emissions. The emission testing shall be conducted as specified in 40 CFR 60.444 and 60.446.
 - c. Method 25 or 25A of 40 CFR Part 60, Appendix A, shall be employed to demonstrate compliance with the allowable mass emission rate and the destruction efficiency. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The Cleveland DAQ will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.
 - d. The emission tests shall be conducted while the emissions unit is operating at or near its maximum operating capacity, unless otherwise specified or approved by Cleveland DAQ.
 - e. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and U.S.EPA Methods 25 or 25A or 40 CFR Part 60, Appendix A. Method 24A or 24 shall be used to determine VOC contents of the coatings. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of the interfering gases.
 - f. The results of the performance test shall be converted to pounds of VOC per hour from the reported pounds of organic carbon per hour (from Method 25 or 25A).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time (s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to tests may result in the Cleveland DAQ's refusal to accept the results of this emission tests.



Final Permit-to-Install and Operate

Ritrama Duramark

Permit Number: P0115466

Facility ID: 1318007355

Effective Date: 12/26/2013

Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emission unit and the testing procedures provide a valid characterization of the emissions from the emissions from the emissions unit and /or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or person responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the tests.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.