

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **13-04316**

**A. Source Description**

Cleveland Laminating has submitted a Chapter 31 Modification application to cover all existing emissions units at the facility. The existing Title V permit covers emissions units K001 and K002. K005 was also included in the Title V permit as an insignificant emission unit. A PTI was never issued for this adhesive coating line previously because it was exempted via OAC rule 3745-15-05 "de minimis" exemption. . This PTI recommendation is for three adhesive coating (laminating) lines K001, K002 and K005. Cleveland Laminating Corporation is a Title V facility, but they are limiting coating usage to opt out of the Title V program and have submitted applications for the facility in order to receive facility-wide synthetic minor restrictions. The terms and conditions of this PTI will supercede the terms and conditions of the Title V permit.

**B. Facility Emissions and Attainment Status**

Based on engineering calculations the maximum potential to emit at 8,760 hours from all three units combined is 2640.3 tons per year of VOCs. Cuyahoga county is currently designed as attainment for ozone. This facility is classified as a major source for Title V purposes. The synthetic minor restrictions would limit the PTE to below Title V thresholds. Cuyahoga County is designated as attainment for ozone (1-hr average).

**C. Source Emissions**

Cleveland Laminating intends to avoid the Title V permitting procedures by limiting the total HAPs for the facility to 23.8 tons per year based on a rolling 12 month summation, single HAPs to 9.9 and VOC to 93.3 tons per year. These sources have the potential to emit (PTE) more than 100 tpy VOC (2640.3 tpy) when combined, resulting in Title V applicability. In addition, these sources have the PTE more than 10 tpy single HAP and 25 tpy combined HAPs. The permittee has chosen to restrict VOC emissions from these sources below the 100 tpy Title V threshold for VOC and below the 10/25 tpy HAP threshold.

**D. Conclusion**

The Cleveland Local Air Agency (CLAA) recommends approval of this permit because a review of the historical facility material usage data verifies that the actual facility emissions are significantly lower than the theoretical potential emissions. The facility proposes to meet the limitations by limiting the total monthly adhesive usage for all three laminators to 33,000 gallons, with a 0.48 lbs/hr VOC content, total HAP limit of 0.12 lbs/gal and single HAP limit of 0.050 lbs/gal as mixed and applied. The three (3) laminators will be restricted by federally enforceable limitations in the PTI. With the enforceable permit terms and conditions limiting operations, this permit is a "Synthetic Minor" and, therefore, not subject to Title V permitting requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL  
CUYAHOGA COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 13-04316**

**DATE: 7/29/2004**

Cleveland Laminating Corporation  
Steve Williams  
2909 East 79th Street  
Cleveland, OH 44104

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CLAA

PA

**CUYAHOGA COUNTY**

PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04316** FOR AN AIR CONTAMINANT SOURCE FOR  
**CLEVELAND LAMINATING CORPORATION**

On 7/29/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Cleveland Laminating Corporation**, located at **2909 East 79th Street, Cleveland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04316:

**Modify K005 and adopt synthetic minor limits on this laminator coater with flash off oven -- K005.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]



**Permit To Install  
Terms and  
Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 13-04316**

Application Number: 13-04316  
APS Premise Number: 1318000242  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Cleveland Laminating Corporation  
Person to Contact: Steve Williams  
Address: 2909 East 79th Street  
Cleveland, OH 44104

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2909 East 79th Street  
Cleveland, Ohio**

Description of proposed emissions unit(s):  
**Modify K005 and adopt synthetic minor limits on this laminators coater with flash off oven -- K005.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Cleveland Laminating Corporation

Facility ID: 1318000242

PTI Application: 13-04316

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## 2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## 4. Title IV Provisions

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

## 5. Severability Clause

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

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally

**Cleveland Laminating Corporation**

**Facility ID: 1318000242**

**PTI Application: 13-04316**

**Issued: To be entered upon final issuance**

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

**Cleveland Laminating Corporation**

**Facility ID: 1318000242**

**PTI Application: 13-04316**

**Issued: To be entered upon final issuance**

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### **12. Air Pollution Nuisance**

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.

Cleveland Laminating Corporation

Facility ID: 1318000242

PTI Application: 13-04316

Issued: To be entered upon final issuance

**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.)

**3. Permit Transfers**

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

**4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

Cleveland Laminating Corporation

Facility ID: 1318000242

PTI Application: 13-04316

**Issued: To be entered upon final issuance**

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **5. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### **6. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **7. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

Cleveland Laminating Corporation

Facility ID: 1318000242

PTI Application: 13-04316

**Issued: To be entered upon final issuance**

if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	93.3
Single HAP	9.9
Combined HAP	23.8

**Cleveland Laminating Corporation**

**Facility ID: 1318000242**

**PTI Application: 13-04316**

**Issued: To be entered upon final issuance**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

none

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

none

Clevel  
PTI A

Emissions Unit ID: K001

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Laminators coater and natural gas flash-off oven	OAC rule 3745-31-05(A)(3)	60.5 lb/hr VOC Volatile organic content (VOC) content shall not exceed 0.48 pounds per gallon, excluding water and exempt solvents.
	OAC rule 3745-21-09(F)	The requirements of this rule include compliance with OAC Rule 3745-31-05 (C)
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT	The requirements established by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).  See section A.2.a through section A.2.b.  31.1 tons VOC/rolling, 12-month period

2. Additional Terms and Conditions

- 2.a The maximum annual VOC emissions generated at this facility shall not exceed 93.3 tons per year, based on a rolling, 12-month summation of emissions.
- 2.b The maximum annual Hazardous Air Pollutant (HAP) emissions and material usage generated at this facility shall not exceed 9.9 tons per year for any single HAP and 23.8 tons per year for any combined HAPs, based on a rolling, 12-month summation of

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emissions.

- 2.c The current list of emissions units at this facility are K001, K002, and K005.

**II. Operational Restrictions**

1. The permittee shall not exceed 31.1 tons VOC material usage, based on a rolling, 12 - month summation of emissions per year.
2. The permittee shall not exceed 93.3 tons VOC material usage, based on a rolling, 12 - month summation of emissions, determined by summing (III.2.b x III.2.c)/ 2000 lbs/ton for each coating employed.
3. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual HAP and VOC emissions calculated from material usage records over the previous twelve calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

**III. Monitoring and/or Recordkeeping Requirement**

1. The permittee shall collect and record the following information monthly for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content, in lbs/gal, of each coating, as applied;
  - c. the amount, in gallons, of each coating;
  - d. the VOC emission rate and material usage, in lbs/month, determined by summing (b x c) for each coating employed;
  - e. the VOC content, in lbs/gal less water and exempt solvents, of each coating, as applied;
  - f. the individual \* HAP and combined HAP content in lbs/gal, for each coating material employed; and
  - g. the total individual HAP and combined HAP emissions for each coating material employed, in lbs/month [sum of (f x c) for all adhesives employed].

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be

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obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

2. The permittee shall maintain monthly records of the following for the facility (see A.I.2.c):
  - a. the rolling, 12-month individual HAP material usage and emissions calculated by summing the records of III.i.g in pounds per month for the emissions units at this facility;
  - b. the rolling, 12-month combined HAP material usage and emissions from all materials employed calculated by summing the records of III.i.g in pounds per month for the emissions units at this facility;
  - c. the rolling, 12-month VOC emission rate calculated by summing the records of III.1.d. in pounds per month for the emissions units at this facility.
  - d. the rolling, 12-month material usage and emission rate calculated by summing the records of III.1.d. in pounds per month for the emissions units at this facility.

**IV. Reporting Requirements**

1. The permittee shall notify the Cleveland Division of Air Quality in writing of any monthly record showing the use of noncomplying coating. The notification shall include a copy of such record and shall be sent to the Cleveland Division of Air Quality within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports that specify the total HAP and VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility (see A.I.2.c) :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 23.8 tons/yr based on a rolling, 12-month summation;

Emissions Unit ID: K001

- c. an identification of each month during which the rolling, 12-month VOC emissions exceed 93.3 tons/yr based on a rolling, 12-month summation;
- d. an identification of each month during which the rolling, 12-month material usage and emissions exceed 93.3 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

## V. Testing Requirements

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

- a. Emission Limitation:  
60.5 lbs VOC / hr

Applicable Compliance Method:

Compliance with the maximum hourly VOC emissions limitation (potential to emit) shall be assumed if company does not exceed the lbs oc/gal limitation. Pound per hour limitation determined using the following equation:

$$\text{VOC (lb/hr)} = (\text{summation of Section A.III.2.b} \times \text{A.III.2.c})$$

- b. Emission Limitation:  
31.1 tpy VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section A.III and the following equation:

$$\text{VOC (tpy)} = (\text{summation of Section A.III.1.d. per rolling, 12-month period}) / 2000 \text{ lbs/ton}$$

- c. Emission Limitation:  
93.3 tons VOC per rolling, 12-month period for this facility\*

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Section A.III.2.

- d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*

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Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections A.III.2.

- e. Emission Limitation:  
23.8 tons combined HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections A.III.2.

- f. Operational Limitation:  
VOC content of all coatings shall not exceed 0.48 pounds VOC per gallon of coating less water and exempt solvents.

Applicable Compliance Method:

Compliance with the above limitation shall be based on the record keeping specified in section A.III.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) of 40 CFR, Part 60, Appendix A.

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K001-K002 and K005 and all future emissions units proposed for this location unless the facility obtains the status of a major source and meets all applicable regulatory requirements for such status.

**VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Laminators coater and natural gas flash-off oven		

**2. Additional Terms and Conditions**

2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

- 1. The permit to install for this emissions unit (K001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied 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), which has been adjusted for a 6 day and 12 hour per day work week. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: vinyl acetate  
 TLV (ug/m3): 35210.6  
 Maximum Hourly Emission Rate (lbs/hr): 5.3 (assuming worst case)  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 96.11  
 MAGLC (ug/m3): 838.3

Physical changes to or changes in the method of operation of the emissions unit after its installation could affect the parameters used to determine whether or not the "Air Toxic Policy" is

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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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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.

**IV. Reporting Requirements**

**Cleveland Laminating Corporation**

**PTI Application: 13 04316**

**Issued**

**Facility ID: 1318000242**

Emissions Unit ID: K001

None.

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Laminators coater and infrared flash-off oven	OAC rule 3745-31-05(A)(3)	29.8 lb/hr VOC Volatile organic content (VOC) content shall not exceed 0.48 pounds per gallon, excluding water and exempt solvents.  The requirements of this rule include compliance with OAC Rule 3745-31-05 (C)
	OAC rule 3745-21-09(F)	The requirements established by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT	See section A.2.a through section A.2.b.  31.1 tons VOC/rolling, 12-month period

**2. Additional Terms and Conditions**

- 2.a The maximum annual VOC emissions generated at this facility shall not exceed 93.3 tons per year, based on a rolling, 12-month summation of emissions.
- 2.b The maximum annual Hazardous Air Pollutant (HAP) emissions and material usage generated at this facility shall not exceed 9.9 tons per year for any single HAP and 23.8 tons per year for any combined HAPs, based on a rolling, 12-month summation of

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emissions.

2.c The current list of emissions units at this facility are K001, K002, and K005.

## II. Operational Restrictions

1. The permittee shall not exceed 31.1 tons VOC material usage, based on a rolling, 12 - month summation of emissions per year.
2. The permittee shall not exceed 93.3 tons VOC material usage, based on a rolling, 12 - month summation of emissions, determined by summing (III.2.b x III.2.c)/ 2000 lbs/ton for each coating employed.
3. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual HAP and VOC emissions calculated from material usage records over the previous twelve calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

## III. Monitoring and/or Recordkeeping Requirement

1. The permittee shall collect and record the following information monthly for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content, in lbs/gal, of each coating, as applied;
  - c. the amount, in gallons, of each coating;
  - d. the VOC emission rate and material usage, in lbs/month, determined by summing (b x c) for each coating employed;
  - e. the VOC content, in lbs/gal less water and exempt solvents, of each coating, as applied;
  - f. the individual \* HAP and combined HAP content in lbs/gal, for each coating material employed; and
  - g. the total individual HAP and combined HAP emissions for each coating material employed, in lbs/month [sum of (f x c) for all adhesives employed].

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be

Emissions Unit ID: K002

obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

2. The permittee shall maintain monthly records of the following for the facility (see A.I.2.c):
  - a. the rolling, 12-month individual HAP material usage and emissions calculated by summing the records of III.i.g in pounds per month for the emissions units at this facility;
  - b. the rolling, 12-month combined HAP material usage and emissions from all materials employed calculated by summing the records of III.i.g in pounds per month for the emissions units at this facility;
  - c. the rolling, 12-month VOC emission rate calculated by summing the records of III.1.d. in pounds per month for the emissions units at this facility.
  - d. the rolling, 12-month material usage and emission rate calculated by summing the records of III.1.d. in pounds per month for the emissions units at this facility.

#### IV. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality in writing of any monthly record showing the use of noncomplying coating. The notification shall include a copy of such record and shall be sent to the Cleveland Division of Air Quality within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports that specify the total HAP and VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility (see A.I.2.c) :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 23.8 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month VOC emissions exceed 93.3 tons/yr based on a rolling, 12-month summation;

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- d. an identification of each month during which the rolling, 12-month material usage and emissions exceed 93.3 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

**V. Testing Requirements**

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

- a. Emission Limitation:  
29.8 lbs VOC / hr

## Applicable Compliance Method:

Compliance with the maximum hourly VOC emissions limitation (potential to emit) shall be assumed if company does not exceed the lbs oc/gal limitation. Pound per hour limitation determined using the following equation:

$$\text{VOC (lb/hr)} = (\text{summation of Section A.III.2.b} \times \text{A.III.2.c})$$

- b. Emission Limitation:  
31.1 tpy VOC per rolling, 12-month period

## Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section A.III and the following equation:

$$\text{VOC (tpy)} = (\text{summation of Section A.III.1.d. per rolling, 12-month period}) / 2000 \text{ lbs/ton}$$

- c. Emission Limitation:  
93.3 tons VOC per rolling, 12-month period for this facility\*

## Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Section A.III.2.

- d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*

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Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections A.III.2.

- e. Emission Limitation:  
23.8 tons combined HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections A.III.2.

- f. Operational Limitation:  
VOC content of all coatings shall not exceed 0.48 pounds VOC per gallon of coating less water and exempt solvents.

Applicable Compliance Method:

Compliance with the above limitation shall be based on the record keeping specified in section A.III.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) of 40 CFR, Part 60, Appendix A.

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K001-K002 and K005 and all future emissions units proposed for this location unless the facility obtains the status of a major source and meets all applicable regulatory requirements for such status.

**VI. Miscellaneous Requirements**

**None.**

Cleveland Laminating Corporation

PTI Application: 13-04316

Issued

Facility ID: 1318000242

Emissions Unit ID: K002

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Laminators coater and infrared flash-off oven		

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit (K002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied 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), which has been adjusted for a 6 day and 12 hour per day work week. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: vinyl acetate

TLV (ug/m3): 35210.6

Maximum Hourly Emission Rate (lbs/hr): 2.6 (assuming worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49.72

MAGLC (ug/m3): 838.3

Physical changes to or changes in the method of operation of the emissions unit after its installation 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

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permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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.

**IV. Reporting Requirements**

None.

**Cleveland Laminating Corporation**  
**PTI Application: 13-04316**  
**Issued**

**Facility ID: 1318000242**

Emissions Unit ID: K002

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.

Clevel

PTI A

Emissions Unit ID: K005

**Issued: To be entered upon final issuance****Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, and/or Equipment</u>	<u>Property,</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Laminators coater and infrared flash-off oven		OAC rule 3745-31-05(A)(3)	41.8 lb/hr VOC Volatile organic content (VOC) content shall not exceed 0.48 pounds per gallon, excluding water and exempt solvents.  The requirements of this rule include compliance with OAC Rule 3745-31-05 (C)
		OAC rule 3745-21-09(F)	The requirements established by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
		OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT	See section A.2.a through section A.2.b.  31.1 tons VOC/rolling, 12-month period

**2. Additional Terms and Conditions**

- 2.a The maximum annual VOC emissions generated at this facility shall not exceed 93.3 tons per year, based on a rolling, 12-month summation of emissions.
- 2.b The maximum annual Hazardous Air Pollutant (HAP) emissions and material usage generated at this facility shall not exceed 9.9 tons per year for any single HAP and 23.8 tons per year for any combined HAPs, based on a rolling, 12-month summation of

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emissions.

**2.c** The current list of emissions units at this facility are K001, K002, and K005.

## **II. Operational Restrictions**

1. The permittee shall not exceed 31.1 tons VOC material usage, based on a rolling, 12 - month summation of emissions per year.
2. The permittee shall not exceed 93.3 tons VOC material usage, based on a rolling, 12 - month summation of emissions, determined by summing (III.2.b x III.2.c)/ 2000 lbs/ton for each coating employed.
3. To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the actual HAP and VOC emissions calculated from material usage records over the previous twelve calendar months of operation shall be used to calculate the rolling, 12-month emissions for the facility.

## **III. Monitoring and/or Recordkeeping Requirement**

1. The permittee shall collect and record the following information monthly for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content, in lbs/gal, of each coating, as applied;
  - c. the amount, in gallons, of each coating;
  - d. the VOC emission rate and material usage, in lbs/month, determined by summing (b x c) for each coating employed;
  - e. the VOC content, in lbs/gal less water and exempt solvents, of each coating, as applied;
  - f. the individual \* HAP and combined HAP content in lbs/gal, for each coating material employed; and
  - g. the total individual HAP and combined HAP emissions for each coating material employed, in lbs/month [sum of (f x c) for all adhesives employed].

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be

Emissions Unit ID: K005

obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on an emissions unit - by - emissions unit basis.

2. The permittee shall maintain monthly records of the following for the facility (see A.I.2.c):
  - a. the rolling, 12-month individual HAP material usage and emissions calculated by summing the records of III.i.g in pounds per month for the emissions units at this facility;
  - b. the rolling, 12-month combined HAP material usage and emissions from all materials employed calculated by summing the records of III.i.g in pounds per month for the emissions units at this facility;
  - c. the rolling, 12-month VOC emission rate calculated by summing the records of III.1.d. in pounds per month for the emissions units at this facility.
  - d. the rolling, 12-month material usage and emission rate calculated by summing the records of III.1.d. in pounds per month for the emissions units at this facility.

#### **IV. Reporting Requirements**

1. The permittee shall notify the Cleveland Division of Air Quality in writing of any monthly record showing the use of noncomplying coating. The notification shall include a copy of such record and shall be sent to the Cleveland Division of Air Quality within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports that specify the total HAP and VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which include the following information for the facility (see A.I.2.c) :
  - a. an identification of each month during which the rolling, 12-month individual HAP material usage and emissions exceed 9.9 tons/yr based on a rolling, 12-month summation;
  - b. an identification of each month during which the rolling, 12-month combined HAP material usage and emissions exceed 23.8 tons/yr based on a rolling, 12-month summation;
  - c. an identification of each month during which the rolling, 12-month VOC emissions exceed 93.3 tons/yr based on a rolling, 12-month summation;

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- d. an identification of each month during which the rolling, 12-month material usage and emissions exceed 93.3 tons/yr based on a rolling, 12-month summation;

The deviation (excursion) report shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month during which they were identified and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measures which have been, or will be taken, to correct the situation.

**V. Testing Requirements**

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

- a. Emission Limitation:  
41.8 lbs VOC / hr

## Applicable Compliance Method:

Compliance with the maximum hourly VOC emissions limitation (potential to emit) shall be assumed if company does not exceed the lbs oc/gal limitation. Pound per hour limitation determined using the following equation:

$$\text{VOC (lb/hr)} = (\text{summation of Section A.III.2.b} \times \text{A.III.2.c})$$

- b. Emission Limitation:  
31.1 tpy VOC per rolling, 12-month period

## Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in Section A.III and the following equation:

$$\text{VOC (tpy)} = (\text{summation of Section A.III.1.d. per rolling, 12-month period}) / 2000 \text{ lbs/ton}$$

- c. Emission Limitation:  
93.3 tons VOC per rolling, 12-month period for this facility\*

## Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Section A.III.2.

- d. Emission Limitation:  
9.9 tons individual HAP emissions per rolling, 12-month period for this facility\*

**Cleveland Laminating Corporation**

**PTI Application: 13-04316**

**Issued**

**Facility ID: 1318000242**

Emissions Unit ID: K005

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections A.III.2.

e. Emission Limitation:

23.8 tons combined HAP emissions per rolling, 12-month period for this facility\*

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in Sections A.III.2.

f. Operational Limitation:

VOC content of all coatings shall not exceed 0.48 pounds VOC per gallon of coating less water and exempt solvents.

Applicable Compliance Method:

Compliance with the above limitation shall be based on the record keeping specified in section A.III.1 (a certificate of analysis from the material supplier may be used to satisfy this requirement). The VOC content of the coatings shall be determined using USEPA Methods 24 (for coatings) of 40 CFR, Part 60, Appendix A.

- \* the facility emission (or usage) limits shall include emissions (or usage) from the following units: K001-K002 and K005 and all future emissions units proposed for this location unless the facility obtains the status of a major source and meets all applicable regulatory requirements for such status.

## **VI. Miscellaneous Requirements**

**None.**

Clevel

PTI A

Emissions Unit ID: K005

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Laminators coater and infrared flash-off oven		

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

None.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit (K005) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied 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), which has been adjusted for a 6 day and 12 hour per day work week. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: vinyl acetate

TLV (ug/m3): 35210.6

Maximum Hourly Emission Rate (lbs/hr): 3.9 (assuming worst case)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 740.9

MAGLC (ug/m3): 838.3

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Physical changes to or changes in the method of operation of the emissions unit after its installation 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 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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.

**Cleveland Laminating Corporation**  
**PTI Application: 13-04316**  
**Issued**

**Facility ID: 1318000242**

Emissions Unit ID: K005

#### **IV. Reporting Requirements**

None.

38

Clevel

PTI A

**Issued: To be entered upon final issuance**

Emissions Unit ID: K005

**V. Testing Requirements**

None.

**VI. Miscellaneous Requirements**

None.