



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 13-04561

Fac ID: 1318000242

DATE: 10/4/2005

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

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

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

CC: USEPA

CLAA

XXXX



**Permit To Install
Terms and Conditions**

**Issue Date: 10/4/2005
Effective Date: 10/4/2005**

FINAL PERMIT TO INSTALL 13-04561

Application Number: 13-04561
Facility ID: 1318000242
Permit Fee: **\$200**
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):
Installation of new laminator emissions unit K006.

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

Part I - GENERAL TERMS AND CONDITIONS

A. 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 information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and

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regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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 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.

9. 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

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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.

10. 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.

11. 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.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to

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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 emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

15. 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.

B. 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.

Cleveland Laminating Corporation
PTI Application: 12-04564
Issue

Facility ID: 1318000242

Emissions Unit ID: K006

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

<u>Pollutant</u>	<u>Tons Per Year</u>
K006: VOC	31.1
Facility: VOC	93.3
Single HAP	9.9
Combined HAP	23.8

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. 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>
K006 - Laminator coater and infrared flash-off oven	OAC rule 3745-31-05(A)(3)	29.8 lb/hr VOC Volatile organic compound (VOC) content of the coatings shall not exceed 0.48 pound per gallon, 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, MACT, and Nonattainment NSR.	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 emissions.

- 2.c** The current list of emissions units at this facility are K001, K002, and K005. Emissions unit K001 will be removed prior to installation of K006.

B. Operational Restrictions

1. The permittee shall not exceed 31.1 tons VOC material usage for this emissions unit, based on a rolling, 12 - month summation of VOC material usage per year, determined by summing (C.1.d) /2000 lbs/ton for each coating.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Months</u>	<u>Maximum Allowable Cumulative VOC Material Usage</u>
1	3
1 - 2	5.6
1 - 3	8.2
1 - 4	10.8
1 - 5	13.4
1 - 6	16.0
1 - 7	18.6
1 - 8	21.2
1 - 9	23.8
1 - 10	26.4
1 - 11	29.0
1 - 12	31.1

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual VOC material usage limitation shall be based upon a rolling, 12-month summation of the VOC material usage figures.

2. The permittee shall not exceed 93.3 tons VOC material usage for the emissions units at

this facility, based on a rolling, 12 - month summation of VOC material usage , determined by summing (C.1.d)/ 2000 lbs/ton for each coating employed for all emissions units at this facility.

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.

C. 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 VOC 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 and material usage 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 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.2.c):

- a. the rolling, 12-month individual HAP material usage and emissions calculated by summing the records of C.1.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 C.1.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 C.1.d. in pounds per month for the emissions units at this facility.
 - d. the rolling, 12-month VOC material usage calculated by summing the records of C.1.d. in pounds per month for the emissions units at this facility.
3. The permit to install for this emissions unit (K006) 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), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: vinyl acetate

TLV (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 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.).
4. 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.
5. 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.

D. Reporting Requirements

Emissions Unit ID: **K006**

1. The permittee shall notify the Cleveland Division of Air Quality in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the 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.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;
 - d. an identification of each month during which the rolling, 12-month VOC material usage 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.

4. The permittee shall submit deviation (excursion) reports to the Cleveland DAQ which identify all exceedances of the rolling, 12-month VOC material usage limitation (31.1 tons VOC material per rolling 12-months) for this emissions unit and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC material usage levels.

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.

E. 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 VOC /gal limitation. Pound per hour limitation determined using the following equation:

$$\text{VOC (lb/hr)} = (0.48 \text{ lb VOC/gal}) * (62 \text{ gal/hr})$$

- 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 C and the following equation:

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

- 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 C.2.

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

Applicable Compliance Method:

Emissions Unit ID: **K006**

Compliance shall be determined based on the recordkeeping specified in Sections C.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 record keeping specified in Sections C.2.

- f. Operational Limitation:
VOC content of all coatings shall not exceed 0.48 pound VOC per gallon of coating

Applicable Compliance Method:
Compliance with the above limitation shall be based on the record keeping specified in section C.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 Method 24 (for coatings) of 40 CFR, Part 60, Appendix A.

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PTI A

Issued: 10/4/2005

Emissions Unit ID: **K006**

- * the facility emission (or usage) limits shall include emissions (or usage) from the following units: K002, K005, and K006

F. Miscellaneous Requirements

None