Facility ID: 0684020020 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0684020020 Emissions Unit ID: K011 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

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

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

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

2. **Additional Terms and Conditions**

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

B. **Operational Restrictions**

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

   MONTH(S) CUMULATIVE, ALLOWABLE VOC EMISSIONS (TONS)

   1 5.11
   1-2 10.22
   1-3 15.33
   1-4 20.44
   1-5 25.55
   1-6 30.66
   1-7 35.77
   1-8 40.88
   1-9 45.99
   1-10 51.10
   1-11 56.21
   1-12 61.30

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information on a monthly basis for K003-K008, K011, and K012 :

   a. The name and identification of each cleanup material employed.

   b. The VOC content of each cleanup material, in pounds per gallon.

   c. The number of gallons of each cleanup material employed.

d. The VOC content of each coating, excluding water and exempt solvents.

e. The number of gallons (excluding water and exempt solvents) of each coating employed.

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

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

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

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

2. The permittee shall collect and record the following information on a monthly basis for K011:

a. The name and identification of each cleanup material employed.

b. The VOC content of each cleanup material, in pounds per gallon.

c. The number of gallons of each cleanup material employed.

d. The VOC content of each coating and ink in pounds per gallon of coating or ink, excluding water and exempt solvents, and in kilograms per kilogram of coating or ink solids.

e. The number of gallons (excluding water and exempt solvents) of each coating and ink employed.

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

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

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

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify any monthly record showing :

a. The use of noncomplying coatings (regarding VOC content).

b. An exceedence of the cumulative, monthly VOC emission limit for K003-K008, K011, and K012.

c. An exceedence of the rolling 12 - month VOC emission summation limit for K003-K008, K011, and K012.

d. An exceedence of the rolling 12 - month VOC emission summation limit for K011.

E. **Testing Requirements**

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

2. Compliance with the emission limitation of 1.0 kilogram VOC per kilogram ink solids shall be based on the record keeping specified in Section C.2 of this permit.

3. Compliance with the emission limitation of 61.3 tons VOC per year shall be based on the record keeping specified in Section C.1.

4. Compliance with the emission limitation of 39 tons VOC per year shall be based on the record keeping specified in Section C.2.

F. **Miscellaneous Requirements**

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