John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

3/10/2014

Certified Mail

Daniel Jones
Avery Dennison STD, Bldg 5
250 Chester St., Building 5
Painesville, OH 44077

Facility ID: 0243111362
Permit Number: P0085050
County: Lake

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 1/28/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northeast District Office

Response to Comments

Facility ID:	0243111362
Facility Name:	Avery Dennison STD, Bldg 5
Facility Description:	Paper Coating lines
Facility Address:	250 Chester Street Bldg. 5 Painesville, OH 44077 Lake County
Permit:	P0085050, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Lake County News-Herald on 01/31/2014. The comment period ended on 03/02/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: None

b. Response: None

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Avery Dennison STD, Bldg 5

Facility ID:	0243111362
Permit Number:	P0085050
Permit Type:	Renewal
Issued:	3/10/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Avery Dennison STD, Bldg 5

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Authorization

Facility ID:	0243111362
Facility Description:	Paper Coating lines
Application Number(s):	A0015662
Permit Number:	P0085050
Permit Description:	Renewal Title V permit for five paper and film coating lines, two material weigh stations and a solvent cleaner station with storage.
Permit Type:	Renewal
Issue Date:	3/10/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0085049

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Avery Dennison STD, Bldg 5
250 Chester Street
Bldg. 5
Painesville, OH 44077

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) 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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. 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.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, 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:

(1) 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.

(2) 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 paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) 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 Ohio EPA DAPC, Northeast District Office 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. 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 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.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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 Ohio EPA DAPC, Northeast District Office 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).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJ: K003, K009, K010, K014, and K016.

   The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://efcr.gpoaccess.gov (http://efcr.gpoaccess.gov/) or by contacting the Ohio EPA Northeast District Office.

3. Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

   a) Affected Sources:

      (1) According to 63.7485, 63.7490 and 63.7499, emissions units B018, B019, and B020 are existing affected sources located at a major source subject to the requirements for a boiler designed to burn natural gas with a heat input less than 10 MMBtu. These are affected sources under the final Boiler MACT rule promulgated on March 21, 2011 as amended on January 31, 2013 (40 CFR Part 63, Subpart DDDDD) subject to work practice standards specified in 40 CFR 63.7540 with a compliance date of January 31, 2016. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://efcr.gpoaccess.gov (http://efcr.gpoaccess.gov/) or by contacting the Ohio EPA Northeast District Office.

   b) Applicable Emission Limitations and /or Control Requirements

63.7500(a)(1) and Table 3	Work practice standards required
63.7500(a)(3)	Operating and maintaining source
63.7500(b)	Approval or alternative work practice standards
63.7565 and Table 10	General Provisions

   c) Operational Restrictions

63.7510(e)	Initial compliance demonstration date
63.7515(e)	Biennial tune-up work practice every 25 months

d) Monitoring and Recordkeeping Requirements

63.7540(a)(11) and (12)	Compliance demonstration for work practice standards
63.7555(a)	Records retention
63.7560	Record format and retention

e) Reporting Requirements

63.7530(d)	
63.7530(e)	Notification of Compliance Status for energy assessment
63.7530(f)	Notification of Compliance Status for initial compliance demonstration requirements
63.7545(a)	Submit notifications to delegated authority
63.7545(b)	Initial Notification date for existing sources
63.7545(e)	Notification of Compliance Statue report date and content
63.7545(f)	Notification of alternative fuel use
63.7550 and Table 9	Reporting schedule and content
63.7495(d)	Comply by submitting notifications according to schedule

f) Miscellaneous Requirements

63.7490	What is an affected source?
63.7495(b)	When do I have to comply with this subpart?
63.7575	Definitions for this subpart

4. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H) or because they meet the “de minimis” criteria established in OAC rule 3745-15-05:

DAPC ID	EU Description
B018	205-01 #4 LP Boiler
B019	205-02 #4 HP Boiler
B020	205-03 #4 HP Boiler
P012	Rubber Grinder
P027	Rubber Grinder/Talc Collector
P034	Hot Melt Adhesive Mixer w/ Bag Collector
P055	205-1, 205-2 Corona Treaters
P056	205-01 Mixer
P057	205-02 Mixer
P058	205-03 Mixer
P059	205-04 Mixer
P060	205-01 Mixing Churn
P061	205-02 Mixing Churn
P062	205-03 Mixing Churn
P066	Welding Station
P067	205-01 Resin Crusher

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install (PTI) for this emissions unit.

C. Emissions Unit Terms and Conditions

1. K014, Building 6 Coating Line

Operations, Property and/or Equipment Description:

Building #6 coating line for adhesive and hot melt products with thermal oxidizer(s).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(2) and OAC rule 3745-31-05(A)(3) (PTI 02-4109)	11.4 pounds of VOC per hour as a daily average, including cleanup The BAT determination also includes compliance with OAC rule 3745-21-09(F), 40 CFR Part 60, Subpart RR, 40 CFR Part 63, Subpart KK and 40 CFR Part 63, Subpart JJJJ.
b.	OAC rule 3745-31-05(D)(1)(a) (PTI 02-4109)	6.72 tons of VOC per rolling, 12-month period, including cleanup 98.5% overall VOC reduction by weight for all solvent based coatings, through the use of a permanent total enclosure with 100% capture efficiency and 98.5% destruction efficiency See b)(2)d and b)(2)e.
c.	40 CFR Part 60, Subpart RR Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations [§§60.440 – 60.447] According to 60.440, the affected facility to which the provisions of this	The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3). 0.20 kg VOC/kg of coating solids applied, for non-solvent based coatings that are not vented to the thermal oxidizer.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials constructed after December 30, 1980.	See b)(2)g.
d.	40 CFR Part 63, Subpart JJJJ National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating [§§63.3280-3420]	The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture efficiency accomplished through the use of a permanent total enclosure . See b)(2)f.
e.	OAC rule 3745-21-09(F)(2)(a)	For all solvent based coatings employed in the adhesive coater and/or primer, at least 90% overall reduction of VOC, by weight. For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.067 lb VOC/ lb of coating. For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.08 lb VOC / lb of coating. See b)(2)d and b)(2)e.
f.	OAC rule 3745-21-09(F)(2)(b)	See the work practices in c)(6).

(2) Additional Terms and Conditions

a. All the coaters [I-1, (36,400 acfm); I-2, (27,000 acfm); I-3, (3,600 acfm); I-5 (37,000 acfm); and the Building 6 coater (11,200 acfm and formerly the pilot coat – PTI #02-14471)] at the Specialty Tape Division (STD) facility shall be vented to the thermal oxidizers (STD RTO 1, STD RTO 2, and TOX #5-3, or equivalent) through a manifold system of delivery.

b. The normal operating scenario for this facility during the application of solvent based coatings shall include the use of thermal oxidizers with a combined capacity of 120,000 acfm or more; however, the permittee may employ solvent

based coatings when one thermal oxidizer is down provided that the combined acfm for all the coaters in use does not exceed the capacity of the operating thermal oxidizer[s].

If one thermal oxidizer is not operational, the damper monitoring system (DMS) shall divert all air flow to the remaining thermal oxidizer[s]. The permittee shall operate and maintain an emergency vent alarm system which ensures that the capacity of the remaining thermal oxidizer[s] will not be exceeded.

c. The permittee shall maintain a permanent total enclosure (PTE) that complies with the requirements in 40 CFR Part 51, Appendix M, Reference Method 204, to capture all the VOC emissions from this emissions unit when employing solvent based coatings.

d. A solvent based coating is any coating that must be vented to the thermal oxidizer.

e. A non-solvent based coating is any coating that is not vented to the thermal oxidizer.

f. The complete 40 CFR Part 63 Subpart JJJJ MACT requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting Ohio EPA, Northeast District Office, Division of Air Pollution Control. The applicable requirements are listed in c)(1), d)(1), e)(1), f)(1)h and f)(3) below.

63.3280	What is in this Subpart?
63.3300	Compliance deadline for affected emission sources
63.3310	Definitions
63.3320	Organic HAP emission limitations
63.3340 and Table 2	Applicable 40 CFR Part 63 Subpart A General Provisions

g. The complete NSPS requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting Ohio EPA, Northeast District Office, Division of Air Pollution Control. The applicable requirements are listed in d)(2), e)(2) and f)(1)e below.

60.440	Applicability and designation of affected facility
60.441	Definitions and symbols
60.442	Emission standards for VOC

h. Normal operation of each emissions unit includes employing only pressure sensitive tape and label surface coatings in the primer and/or coater. This permit includes the option to employ other pressure surface coatings in the adhesive coater and/or primer.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3321(a) and Table 1	What operating limits must be met
63.3370(a)(4) and (5)	How to demonstrate compliance with the emission standard
63.3370(e)	Capture system and control device operating requirements
63.3370(j)	Capture and control system compliance demonstration procedures using a CPMS
63.3370(k)	Oxidizer compliance demonstration procedures
63.3370(n)	Compliance using combinations of capture and control systems
63.3370(o)	Compliance with intermittently controlled and never-controlled work stations

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart JJJJ]

(2) The average combustion temperature within each thermal oxidizer, for any 3-hour block of time when any emissions unit(s) is (are) in operation and employing solvent based coatings, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrates this emissions unit was in compliance.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-4109]

(3) This emissions unit shall be totally enclosed such that all VOC emissions are captured, contained, and when employing solvent based coatings, vented to the thermal oxidizers. Compliance with the following criteria, as specified in USEPA Method 204, shall be met by the permittee when employing solvent based coatings:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.

b. the total area of all NDOs shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling.

c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure.

d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-10(C)(3)(c)]

(4) This emissions unit shall be vented to the thermal oxidizers during all solvent based coating operations.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(5) The permittee shall limit coating usage so that the amount of VOC applied, plus the amount of VOC from cleanup materials, is no more than 448 tons per rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(6) The following work practices apply to organic solvent cleaning materials used outside the permanent enclosure where emissions to the atmosphere are not controlled by an approved emission control system with an overall control efficiency of at least 90%.

For emissions from the use of organic solvents for cleanup, the permittee shall:

a. store all VOC-containing cleaning materials and used shop towels in closed containers;

b. ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;

c. minimize spills of VOC-containing cleaning materials;

d. convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

e. minimize VOC emissions from cleaning of storage, mixing, and conveying equipment.

The permittee shall post copies of these requirements around dip tanks and storage tanks and conduct training about these requirements.

[Authority for Term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(F)(2)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3350(a)	Summary of control device and capture system monitoring
63.3350(b)	Monitoring required after date of initial performance test
63.3350(c)	Bypass mode monitoring by flow control position indicator
63.3350(e)(1) through (9)	Continuous parametric monitoring for oxidizer
63.3350(f)	Site-specific capture system monitoring plan requirements
63.3410	Record keeping

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

60.443(a)	Calculating monthly weighted average of mass of solvent per mass of coating solids for non-solvent based coatings (uncontrolled)
60.443(b) and (d)	Requirement is less stringent than OAC rule 3745-31-05(D)(1)
60.443(d)	Thermal incinerator temperature monitoring
60.445(a)	Maintaining monthly record of coating use and VOC content
60.445(e)	Thermal incinerator temperature monitoring
60.445(g)	Permanent total enclosure operation monitoring
60.445(h)	Record retention

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

(3) To demonstrate compliance with OAC rule 3745-31-05(D)(1) and OAC rule 3745-21-09(F)(2), the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal oxidizer when any associated emissions unit(s) is (are) in operation and employing solvent based coatings. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which any average combustion temperature within each thermal oxidizer, when any associated emissions unit was in operation and employing solvent based coatings or inks, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. a log or record of the downtime for the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation and employing solvent based coatings or inks; and

c. a record of all periods of time during which solvent based coatings were employed, but the VOC emissions were not vented to one or both of the thermal oxidizers.

To the extent the above monitoring and record keeping requirements are also contained in 40 CFR Part 63 Subpart JJJJ, compliance with Subpart JJJJ shall also be deemed compliance with this permit term.

[Authority for term: OAC rule 3745-77-07(C)(1) , OAC rule 3745-21-09(B)(3)(l) and PTI# 02-4109]

(4) The permittee shall operate and maintain a continuous pressure drop monitor and recorder which measures and records the pressure drop across the total enclosure when the permittee is employing solvent based coatings in this emissions unit. Units shall be in inches of water. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The pressure drop monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

Compliance with 40 CFR Part 63, Subpart JJJJ continuous monitoring requirements shall be deemed compliance with this permit term.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall collect and record daily the following information for each non-solvent based coating and ink employed in these emissions units:

a. the name and identification number of each coating and ink applied;

b. the number of gallons of each coating material employed, as applied;

c. the coating or ink type and location in the line employed, i.e., non-solvent based coating employed in the printer, non-solvent based pressure sensitive tape and label surface coating in the adhesive coater and/or primer, or all other non-solvent based pressure surface coating employed in the adhesive coater and/or primer;

d. for all non-solvent based coatings employed in the adhesive coater and/or primer, the VOC content in pounds of VOC per pound of coating;

e. for non-solvent based coatings and inks employed in the printing station, the percent VOC by volume of the coating or ink, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating or ink.

The VOC content recorded above shall be calculated according to the respective methods specified in f)(2) and the methods specified in OAC rule 3745-21-09(B).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(f)]

(6) The permittee shall collect and record the following information daily for all solvent based coatings employed in this emissions unit:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, as applied, in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating employed, excluding water and exempt solvents;

d. the total uncontrolled VOC emissions from all the solvent based coatings employed, in pounds and tons; and

e. the calculated, controlled VOC emission rate for all the solvent based coatings, in pounds and tons (the controlled VOC emission rate for the solvent based coatings shall be calculated using the overall control efficiency for the control equipment as determined during the most recent compliance test that demonstrated that the emission unit was in compliance).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(7) The permittee shall collect and record the following information daily for all cleanup materials:

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon; and

d. the total VOC emissions from all cleanup materials employed in pounds and tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(8) The permittee shall record the following information daily:

a. the total VOC emissions from all coatings and cleanup materials, i.e., the sum of the values from d)(5)d, d)(6)d, and d)(7)d, in pounds;

b. the total operating hours for the emissions unit;

c. the average hourly emission rate, in pounds per hour (a/b);

d. the rolling, 12-month summation of the VOC emissions from all coatings and cleanup materials, in tons;

e. to total VOC usage rate (total uncontrolled VOC emissions) in this coating line, i.e., the sum of the values from d)(5)d., d)(6)d., and d)(7)d., in tons; and

f. the rolling, 12-month summation of the total VOC usage rate, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(9) The permittee shall collect and record the following information monthly for all non-solvent based coatings employed in this emissions unit to demonstrate compliance with 40 CFR Part 60, Subpart RR:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in kg/kg of coating solids, as applied;

c. the weight fraction of VOC in each coating;

d. the weight fraction of solids in each coating;

e. the total mass of each coating, in kgs; and

f. the mass-weighted average VOC content for all the coatings employed, in kg/kg of coating solids, calculated in accordance with the equation in section 60.443(a)(2) of Subpart RR.

If the VOC content of each non-solvent based coating employed during the calendar month does not exceed 0.20 kg of VOC/kg of solids, the permittee has demonstrated compliance with the VOC content limitation for that month and is not required to calculate the mass-weighted VOC content for all the coatings employed during the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR)]

(10) The permittee shall perform monthly checks of the storage areas for all VOC containing cleaning materials and used shop towels and cleaning storage, mixing, and conveying equipment to ensure continuing compliance with the work practice standards applicable to organic solvent cleaning materials used outside the permanent enclosure.

Records shall be kept of each monthly check, and shall include any corrective actions taken by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3400(a)	General requirement to submit notifications and reports
63.3400(b)	Initial Notification Requirements
63.3400(c)	Semi-annual compliance report requirements
63.3400(d)	Notification of Performance Test requirements
63,3400(e)	Notification of Compliance Status requirements
63.3400(f)	Performance test report requirement
63.3400(g)	Startup, shutdown and malfunction report requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

60.447(a)	Performance test data and results reporting
60.447(b)	Quarterly or semi-annual exceedance reporting
60.447(c) and 60.7(c)	Thermal Incinerator temperature deviation reporting

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

(3) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the VOC content of any non-solvent based coating exceeded the applicable limitation of 0.20 kg per kg of coating solids as applied.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

(4) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing any monthly record showing that the VOC content of any non-solvent based coating exceeded the applicable limitation of 0.067 pound of VOC per pound of coating.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall submit quarterly excursion reports that identify the following information:

a. all 3-hour blocks of time during which the average combustion temperature within each thermal oxidizer does not comply with the temperature limitation specified above;

b. all 3-hour blocks of time, when the emissions unit was in solvent based operation, during which the permanent total enclosure was not maintained at the minimum pressure differential required above;

c. all periods of downtime for the capture (collection) system, control device, monitoring equipment, when the associated coating or printing line was operating and employing solvent based coatings;

d. all periods of time when the stack that bypasses the thermal oxidizers is used while employing solvent based coatings in this emissions unit;

e. all exceedances of the rolling, 12 month emission limitation of 6.72 tons of VOC including cleanup; and

f. allexceedances of the average hourly limit of 11.44 lbs VOC per hour for the coatings employed including cleanup.

These quarterly reports shall be submitted according to the General Terms and Conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(6) The permittee shall submit an annual report that include:

a. the actual VOC emissions from coating and cleanup material for the previous calendar year, in tons per year.

This report shall be submitted by January 31 of each year. Submitting the complete Fee Emission Report, in a timely manner will satisfy this annual report requirement.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

11.44 lbs VOC per hour on a daily average basis, including cleanup

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(8)c.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

6.72 tons of VOC per rolling, 12-month period, including cleanup

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(8)d.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

98.5% overall VOC reduction, by weight, for all solvent based coatings, through the use of a permanent total enclosure with 100% capture efficiency and 98.5% destruction efficiency

Applicable Compliance Method:

Performance testing was conducted on June 26, 2002 and shall be conducted again within 6 months prior to permit expiration, using the following methods:

40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M, Method 204.

Performance testing shall be in accordance with OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(C)]

d. Emission Limitation:

For all solvent based coatings employed in the adhesive coater and/or primer, at least 90% overall reduction of VOC, by weight.

Applicable Compliance Method:

Demonstrating compliance with the capture and destruction efficiencies standards in 40 CFR Part 63, Subpart JJJJ for HAP emissions shall be sufficient to demonstrate compliance with this standard. If required, compliance shall be demonstrated using the methods in 40 CFR Part 60, Appendix A, Methods 25, 25A, and 40 CFR Part 51, Appendix M, Method 204, and the requirements in OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(C)]

e. Emission Limitation:

0.20 kilogram of VOC per kilogram of coating solids, as applied, when employing non-solvent based coatings that are not vented to the thermal oxidizer

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(9) and the applicable parts of 40 CFR Part 60, Subpart RR.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

f. Emission Limitations:

For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.067 lb VOC/ lb of coating.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5).

g. Emission Limitations:

For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.08 lb VOC / lb of coating.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5).

h. Emission Limitation:

The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture efficiency accomplished through the use of a permanent total enclosure).

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3360(a)(2)	Performance test requirement summary
63.3360(e)	Control device efficiency performance testing
63.3360(b)	Alternate compliance demonstrations for sources using control device to comply with emission limitation
63.3360(e)(1)	Oxidizer control efficiency demonstration
63.3360(e)(2)	Process information required during testing
63.3360(e)(3)	Oxidizer operating temperature requirements

63.3360(f)	Capture efficiency demonstration for permanent total enclosure
63.4700(d)	Notification of Performance Test requirements
63.3400(f)	Performance test report requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) USEPA Method 24 or Method 24A shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine the VOC contents for all coatings and inks. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A. Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of ready to use and experimental coatings if the amount of a specific formulation of a ready to use or an experimental coating used, is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24.

The amount of experiment coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Appendix A, Method 24]

(3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emissions testing shall be conducted within five (5) years of the last test date and every 5 years thereafter, unless otherwise required by the Ohio EPA Northeast District Office.

b. The emissions testing shall be conducted to demonstrate compliance with the overall reduction efficiency limitation and capture efficiency limitation for VOC of 98.5% and 100% respectively.

c. The following test methods shall be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and

Method 204 of 40 CFR Part 51, Appendix M.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at typical operating conditions, to determine compliance with the destruction efficiency and capture efficiency limitations, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

e. After March 2003, the capture efficiency shall be determined using Methods 204 through Method 204F, as specified 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request for the use of an alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)

f. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

h. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

j. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10, and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

2. K016, I-5 Coating Line

Operations, Property and/or Equipment Description:

I-5 paper and film coating line with thermal oxidizers

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(2) and OAC rule 3745-31-05(A)(3) (PTI 02-7206)	12.31 pounds of VOC per hour from the coating line, including cleanup, as a daily average; The requirements of this rule also include compliance with the VOC content limitations specified in 40 CFR Part 60, Subpart RR and OAC rule 3745-21-09.
b.	OAC rule 3745-31-05(D)(1)(a) (PTI 02-7206)	39 tons VOC per rolling, 12-month period from the coating line, including cleanup 98.5% overall VOC reduction by weight (i.e., 100% capture efficiency and 98.5% destruction efficiency) for all solvent based coatings. See b)(2)d and b)(2)e.
c.	40 CFR Part 60, Subpart RR Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations [§§60.440 – 60.447]	For solvent based coatings, the control efficiency limitations specified by this rule are less stringent than the control efficiency limitations established pursuant to OAC rule 3745-31-05(A)(3). 0.20 kg VOC/kg of coating solids applied,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	According to 60.440, the affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials constructed after December 30, 1980.	for coatings that are not vented to the thermal oxidizer(s). See b)(2)g.
d.	40 CFR Part 63, Subpart JJJJ National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating [§§63.3280-3420]	The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture efficiency accomplished through the use of a permanent total enclosure . See b)(2)f.
e.	OAC rule 3745-21-09(F)(2)(a)	For all solvent based coatings employed in the adhesive coater and/or primer, at least 90% overall reduction of VOC, by weight. For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.067 lb VOC/ lb of coating. For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.08 lb VOC / lb of coating. See b)(2)d and b)(2)e.
f.	OAC rule 3745-21-09(F)(2)(b)	See the work practices in c)(11).

(2) Additional Terms and Conditions

a. All the coaters [I-1, (36,400 acfm); I-2, (27,000 acfm); I-3, (3,600 acfm); I-5 (37,000 acfm); and the Building 6 coater (11,200 acfm and formerly the pilot coat – PTI #02-14471)] at the Specialty Tape Division (STD) facility shall be vented to the thermal oxidizers (STD RTO 1, STD RTO 2, and TOX #5-3, or equivalent) through a manifold system of delivery.

b. The normal operating scenario for this facility during the application of solvent based coatings shall include the use of thermal oxidizers with a combined capacity of 120,000 acfm or more; however, the permittee may employ solvent based coatings when one thermal oxidizer is down provided that the combined acfm for all the coaters in use does not exceed the capacity of the operating thermal oxidizer[s].

If one thermal oxidizer is not operational, the damper monitoring system (DMS) shall divert all air flow to the remaining thermal oxidizer[s]. The permittee shall operate and maintain an emergency vent alarm system which ensures that the capacity of the remaining thermal oxidizer[s] will not be exceeded.

c. The permanent enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR Part 51, Appendix M, Reference Method 204, and capture all of the VOC emission from this emissions unit when employing solvent based coatings.

d. A solvent based coating is any coating that must be vented to the thermal oxidizer.

e. A non-solvent based coating is any coating that is not vented to the thermal oxidizer.

f. The complete 40 CFR Part 63 Subpart JJJJ MACT requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting Ohio EPA, Northeast District Office, Division of Air Pollution Control. The applicable requirements are listed in c)(1), d)(1), e)(1), f)(1)(h) and f)(3) below.

63.3280	What is in this Subpart?
63.3300	Compliance deadline for affected emission sources
63.3310	Definitions
63.3320	Organic HAP emission limitations
63.3340 and Table 2	Applicable 40 CFR Part 63 Subpart A General Provisions

g. The complete NSPS requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting Ohio EPA, Northeast District Office, Division of Air Pollution Control. The applicable requirements are listed in d)(2), e)(2), and f)(1)e below.

60.440	Applicability and designation of affected facility
60.441	Definitions and symbols
60.442	Emission standards for VOC

h. Normal operation of each emissions unit includes employing only pressure sensitive tape and label surface coatings in the primer and/or coater. This permit includes the option to employ other pressure surface coatings in the adhesive coater and/or primer.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3321(a) and Table 1	What operating limits must be met
63.3370(a)(4) and (5)	How to demonstrate compliance with the emission standard
63.3370(e)	Capture system and control device operating requirements
63.3370(j)	Capture and control system compliance demonstration procedures using a CPMS
63.3370(k)	Oxidizer compliance demonstration procedures
63.3370(n)	Compliance using combinations of capture and control systems
63.3370(o)	Compliance with intermittently controlled and never-controlled work stations

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart JJJJ]

(2) Pursuant to PTI 02-7206, the average combustion temperature within the thermal oxidizer, for any 3-hour block of time when this emissions unit is in operation and employing solvent based coatings, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated this emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

(3) This emissions unit shall be vented to the thermal oxidizers during all solvent based coating operations except when employing only coatings that comply with the VOC content limits contained in OAC rule 3745-21-09(F) and 40 CFR Part 60 Subpart RR.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

(4) This emissions unit shall be totally enclosed such that all VOC emissions are captured, contained, and when employing solvent based coatings, vented to the thermal oxidizers. Compliance with the following criteria, as specified in USEPA Method 204, shall be met by the permittee when employing solvent based coatings:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.

b. the total area of all NDOs shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling.

c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters/hr (200 fpm). The direction of air flow through all NDOs shall be into the enclosure.

d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-10(C)(3)(c)]

(5) During the required use of the thermal oxidizers, the permittee shall ensure that any inline bypass that could divert solvent laden air from each coating applicator to the ambient air is closed.

In addition, any device in the bypass which indicates a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

(6) The thermal oxidizer control systems shall be designed and operated according to good engineering practices and the manufacturer's specifications.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

(7) The damper monitoring system (DMS) which automatically sends all air flow to the operational thermal oxidizers when the other(s) are not functional shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

(8) When this emissions unit is in operation and employing solvent based coatings, the PTE shall be maintained under negative pressure at a minimum differential pressure, in inches of water as a three-hour average, that is equal to or greater than the differential pressure that was established at the time of the last emissions test that demonstrated compliance with the criteria for the permanent total enclosure. The corresponding differential pressure shall be determined for the PTE when compliance with the 200 fpm facial velocity is deomonstrated.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

(9) The permittee shall limit coating usage so that the amount of VOC applied is no more than 2,600 tons per rolling, 12-month period.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

(10) The concentrations of VOC emissions in accordance with the leak monitoring program for the permanent total enclosure shall not exceed 100 ppm, by volume.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

(11) The following work practices apply to organic solvent cleaning materials used outside the permanent enclosure where emissions to the atmosphere are not controlled by an approved emission control system with an overall control efficiency of at least 90%.

For emissions from the use of organic solvents for cleanup, the permittee shall:

a. store all VOC-containing cleaning materials and used shop towels in closed containers;

b. ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;

c. minimize spills of VOC-containing cleaning materials;

d. convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

e. minimize VOC emissions from cleaning of storage, mixing, and conveying equipment.

The permittee shall post copies of these requirements around dip tanks and storage tanks and conduct training about these requirements.

[Authority for Term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(F)(2)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3350(a)	Summary of control device and capture system monitoring
63.3350(b)	Monitoring required after date of initial performance test
63.3350(c)	Bypass mode monitoring by flow control position indicator
63.3350(e)(1) through (9)	Continuous parametric monitoring for oxidizer
63.3350(f)	Site-specific capture system monitoring plan requirements
63.3410	Record keeping

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

60.443(a)	Calculating monthly weighted average of mass of solvent per mass of coating solids for non-solvent based coatings (uncontrolled)
60.443(b) and (d)	Requirement is less stringent than OAC rule 3745-31-05(D)(1)
60.443(d)	Thermal incinerator temperature monitoring
60.445(a)	Maintaining monthly record of coating use and VOC content
60.445(e)	Thermal incinerator temperature monitoring
60.445(g)	Permanent total enclosure operation monitoring
60.445(h)	Record retention

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart RR]

(3) To demonstrate compliance with OAC rule 3745-31-05(D)(1)(a) and OAC rule 3745-21-09(F)(2), the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal oxidizer when any associated emissions unit(s) is (are) in operation and employing solvent based coatings. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which any average combustion temperature within each thermal oxidizer, when any associated emissions unit was in operation and employing solvent based coatings or inks, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. a log or record of the downtime for the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation and employing solvent based coatings or inks; and

c. a record of all periods of time during which solvent based coatings were employed, but the VOC emissions were not vented to one or both of the thermal oxidizers.

To the extent the above monitoring and record keeping requirements are also contained in 40 CFR Part 63 Subpart JJJJ, compliance with Subpart JJJJ shall also be deemed compliance with this permit term.

[Authority for term: OAC rule 3745-77-07(C)(1) , OAC rule 3745-21-09(B)(3)(l) and PTI 02-7206]

(4) The permittee shall operate and maintain a continuous pressure drop monitor and recorder which measures and records the pressure drop across the total enclosure when the permittee is employing solvent based coatings in this emissions unit. Units shall be in inches of water. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The pressure drop monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

Compliance with 40 CFR Part 63, Subpart JJJJ continuous monitoring requirements shall be deemed compliance with this permit term.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall collect and record daily the following information for each non-solvent based coating and ink employed in these emissions units:

a. the name and identification number of each coating and ink applied;

b. the number of gallons of each coating material employed, as applied;

c. the coating or ink type and location in the line employed, i.e., non-solvent based coating employed in the printer, non-solvent based pressure sensitive tape and label surface coating in the adhesive coater and/or primer, or all other non-solvent based pressure surface coating employed in the adhesive coater and/or primer;

d. for all non-solvent based coatings employed in the adhesive coater and/or primer, the VOC content in pounds of VOC per pound of coating;

e. for non-solvent based coatings and inks employed in the printing station, the percent VOC by volume of the coating or ink, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating or ink.

The VOC content recorded above shall be calculated according to the respective methods specified in f)(2) and the methods specified in OAC rule 3745-21-09(B).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(f)]

(6) The permittee shall collect and record the following information daily for all solvent based coatings employed in this emissions unit:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, as applied, in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating employed, excluding water and exempt solvents;

d. the total uncontrolled VOC emissions from all the solvent based coatings employed, in pounds and tons; and

e. the calculated, controlled VOC emission rate for all the solvent based coatings, in pounds and tons (the controlled VOC emission rate for the solvent based coatings shall be calculated using the overall efficiency for the control equipment as determined during the most recent compliance test that demonstrated that the emissions unit was in compliance).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(7) The permittee shall collect and record the following information daily for all cleanup materials:

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon; and

d. the total VOC emissions from all cleanup materials employed, in pounds and tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(8) The permittee shall record the following information daily:

a. the total VOC emissions from all coatings and cleanup materials, i.e., the sum of the values from d)(4)d, d)(5)e and d)(6)d, in pounds;

b. the total operating hours for the emissions unit;

c. the average hourly emission rate, in pounds per hour (a/b);

d. the rolling, 12-month summation of VOC emissions from all coatings and cleanup materials, in tons;

e. the total VOC usage rate (total uncontrolled VOC emissions) in this coating line, i.e., the sum of the values from d)(5)d, d)(6)d and d)(7)d, in tons; and

f. the rolling, 12-month summation of the total VOC usage rate, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(9) The permittee shall collect and record the following information monthly for all non-solvent based coatings employed in this emissions unit to demonstrate compliance with 40 CFR Part 60, Subpart RR:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in kg/kg of coating solids, as applied;

c. the weight fraction of VOC in each coating;

d. the weight fraction of solids in each coating;

e. the total mass of each coating, in kgs; and

f. the mass-weighted average VOC content for all the coatings employed, in kg/kg of coating solids, calculated in accordance with the equation in section 60.443(a)(2) of Subpart RR.

If the VOC content of each non-solvent based coating employed during the calendar month does not exceed 0.20 kg of VOC/kg of solids, the permittee has demonstrated compliance with the VOC content limitation for that month and is not required to calculate the mass-weighted VOC content for all the coatings employed during the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR)]

(10) The permittee shall perform monthly checks of the storage areas for all VOC containing cleaning materials and used shop towels and cleaning storage, mixing, and conveying equipment to ensure continuing compliance with the work practice standards applicable to organic solvent cleaning materials used outside the permanent enclosure.

Records shall be kept of each monthly check, and shall include any corrective actions taken by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3400(a)	General requirement to submit notifications and reports
63.3400(b)	Initial Notification Requirements
63.3400(c)	Semi-annual compliance report requirements
63.3400(d)	Notification of Performance Test requirements
63,3400(e)	Notification of Compliance Status requirements

63.3400(f)	Performance test report requirement
63.3400(g)	Startup, shutdown and malfunction report requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

60.447(a)	Performance test data and results reporting
60.447(b)	Quarterly or semi-annual exceedance reporting
60.447(c) and 60.7(c)	Thermal Incinerator temperature deviation reporting

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(3) The permittee shall submit quarterly summary reports that identify the following information:

a. all 3-hour blocks of time during which the average combustion temperature within each thermal oxidizer did not comply with the temperature limitation specified above;

b. all periods of downtime for the capture (collection) system, control device, and monitoring equipment, when the associated coating or printing line was operating and employing solvent based coatings; and

c. all periods of time when the stack that bypasses the thermal oxidizers was used while employing solvent based coatings in this emissions unit.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-7206]

(4) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the VOC content of any non-solvent based coating exceeded the applicable limitation of 0.20 kg per kg of coating solids as applied.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

(5) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any monthly record showing that the VOC content of any non-solvent based coating exceeded the applicable limitation of 0.067 pound of VOC per pound of coating.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(6) Beginning with the first calendar quarter following the installation of the pressure drop monitoring equipment for the PTE, the permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time, when the emissions unit was in solvent based operation, during which the permanent total enclosure was not maintained at the minimum pressure differential required in c)(8).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(7) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[OAC rule 3745-77-07(C)(1)]

(8) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day VOC emission limitation of 39 tons.

[OAC rule 3745-77-07(C)(1)]

(9) The permittee shall submit deviation (excursion) reports that identify all exceedances of the average hourly emission limitation for VOC of 12.31 lbs per hour.

[OAC rule 3745-77-07(C)(1)]

(10) The permittee shall submit deviation (excursion) reports that identify all exceedances of the 365-day summation of total VOC usage in the coating line.

[OAC rule 3745-77-07(C)(1)]

(11) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any quarterly record showing any unacceptable level of VOCs (greater than 100 ppm) from the positive pressure locations of the lines between the permanent enclosure and the thermal oxidizers. A copy of the record shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the exceedance occurred.

[OAC rule 3745-77-07(C)(1)]

(12) The permittee shall submit quarterly summaries of the daily inspections and weekly velocity or pressure drop measurements for the permanent total enclosure required under d)(4). The summaries shall identify the days when the permanent total enclosure was not functioning properly, the cause(s) for the improper operation, and corrective actions taken. The quarterly summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

12.31 pounds of VOC per hour on a daily average basis, including cleanup

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(8)c.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

b. Emission Limitation:

39 tons VOC per rolling, 12-month period from the coating line, including cleanup

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(8)d.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-7206]

c. Emission Limitation:

For all solvent based coatings employed in the adhesive coater and/or primer, at least 90% overall reduction of VOC, by weight.

Applicable Compliance Method:

Demonstrating compliance with the capture and destruction efficiencies standards in 40 CFR Part 63, Subpart JJJJ for HAP emissions shall be sufficient to demonstrate compliance with this standard. If required, compliance shall be

demonstrated using the methods in 40 CFR Part 60, Appendix A, Method 25 or 25A and 40 CFR Part 51, Appendix M, Method 204 and the requirements in OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(C)]

d. Emission Limitation:

98.5% overall VOC reduction, by weight, for all solvent based coatings, through the use of a permanent total enclosure with 100% capture efficiency and 98.5% destruction efficiency.

Applicable Compliance Method:

Performance testing was conducted on June 26, 2002 and shall be conducted again within 6 months prior to permit expiration, using the following methods:

40 CFR Part 60, Appendix A, Method 25 or 25A and 40 CFR Part 51, Appendix M, Method 204.

Performance testing shall be in accordance with OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(C)]

e. Emission Limitation:

0.20 kilogram of VOC per kilogram of coating solids, as applied, when employing non-solvent based coatings that are not vented to the thermal oxidizer

Applicable Compliance Method:

Compliance shall be demonstrated based upon the use of Method 24, or any alternative compliance test method approved by the USEPA for determining the VOC content of each coating, and on the record keeping requirements specified in d)(9).

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart RR]

f. Emission Limitations:

For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.067 lb VOC/ lb of coating.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5).

g. Emission Limitations:

For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.08 lb VOC / lb of coating.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5).

h. Emission Limitation:

The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture efficiency accomplished through the use of a permanent total enclosure).

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3360(a)(2)	Performance test requirement summary
63.3360(e)	Control device efficiency performance testing
63.3360(b)	Alternate compliance demonstrations for sources using control device to comply with emission limitation
63.3360(e)(1)	Oxidizer control efficiency demonstration
63.3360(e)(2)	Process information required during testing
63.3360(e)(3)	Oxidizer operating temperature requirements
63.3360(f)	Capture efficiency demonstration for permanent total enclosure
63.4700(d)	Notification of Performance Test requirements
63.3400(f)	Performance test report requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) USEPA Method 24 or Method 24A shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine the VOC contents for all coatings and inks. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA

provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A. Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of ready to use and experimental coatings if the amount of a specific formulation of a ready to use or an experimental coating used, is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24.

The amount of experiment coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Appendix A, Method 24

(3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emissions testing shall be conducted within five (5) years of the last test date and every 5 years thereafter, unless otherwise required by the Ohio EPA Northeast District Office.

b. The emissions testing shall be conducted to demonstrate compliance with the overall reduction efficiency limitation and capture efficiency limitation for VOC of 98.5% and 100% respectively.

c. The following test methods shall be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and

Method 204 of 40 CFR Part 51, Appendix M.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at typical operating conditions, to determine compliance with the destruction efficiency and capture efficiency limitations, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

e. After March 2003, the capture efficiency shall be determined using Methods 204 through Method 204F, as specified 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the “Guidelines for Determining Capture Efficiency” dated January 9, 1995. (The Ohio EPA will

consider the request for the use of an alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)

f. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

h. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

j. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

[Authority for Term: OAC rule 3745-77-07C)(1), OAC rule 21-10, and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

3. P071, Churn Solvent Wash and Recovery System

Operations, Property and/or Equipment Description:

205-1 churn/drum washer with solvent recovery, including injection recovery stations, storage tank; and distillation unit

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 02-9846)	See b)(2)a, b)(2)b and b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(M)(2).
b.	OAC rule 3745-21-07(M)(2)	Organic compound (OC) emissions shall be reduced by at least 85%.

(2) Additional Terms and Conditions

a. The distillation unit shall be totally enclosed and vented to the thermal oxidizer(s).

b. The permittee shall use good engineering maintenance and practices during the operation of this emissions unit and control equipment.

c. As part of the BAT requirement for this emissions unit, all emissions from the distillation unit shall be vented to the thermal oxidizer(s).

c) Operational Restrictions

(1) The average combustion temperature within each thermal oxidizer, when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-9846]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperatures within each thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which the average combustion temperature within each thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

b. a log or record of the downtime for the capture (collection) system(s), control devices, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-9846]

(2) The permittee shall maintain monthly records of the following information:

a. the amount of solvent processed through each of the following operations: the dirty solvent tank, the clean solvent tank, the churn and tote cleaning, the cleaning of braided hoses in drums, the drum unloading, and the distillation process, in gallons;

b. the OC emissions from each operation identified in (a), using the emission factors specified in f)(1)a, in pounds;

c. the total OC emissions from all the operations identified in (a), in pounds;

d. the total number of days of operation;

e. the average daily OC emission rate, in pounds/day;

f. the total number of hours of operation; and

g. the average hourly OC emission rate, in pounds/hour.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-9846]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within each thermal oxidizer did not comply with the temperature limitation specified above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-9846]

f) Testing Requirements

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

a. Emission Limitation:

OC emissions shall be reduced by at least 85%.

Applicable Compliance Method:

If required by the Ohio EPA, emission tests for the distillation unit shall be performed in accordance with USEPA Method 25 and with OAC rule 3745-21-10. Emission factors derived from any required emission tests shall replace the AP-42-derived emission factors.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-9846]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -K003, K009, K010 coating lines: K003,K009,K010,

EU ID	Operations, Property and/or Equipment Description
K003	I-1 paper and film coating line and flexographic printing station with thermal oxidizers
K009	I-2 paper and film coating line and 2 flexographic printing stations with thermal oxidizers
K010	I-3 paper and film coating line and 2 flexographic printing stations with thermal oxidizers

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(F)(2)(a)	For all solvent based coatings employed in the adhesive coater and/or primer, at least 90% overall reduction of VOC, by weight. For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.067 lb VOC/ lb of coating. For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer that are not controlled by the thermal oxidizer, 0.08 lb VOC / lb of coating. See b)(2)d and b)(2)e.
b.	OAC rule 3745-21-09(F)(2)(b)	See the work practices in c)(6).
c.	OAC rule 3745-21-09(Y)(1)	A capture efficiency that is at least 65%, by weight, and a control efficiency that is at least 90%, by weight, for all the solvent based coatings and inks employed in the printing station.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)d. For the coatings and inks that are not vented to the thermal oxidizer (non-solvent based coatings and inks), the VOC contents of the coatings and inks shall not exceed 40% VOC, by volume, of the coating and ink, excluding water and exempt solvents, or 25% VOC, by volume of the volatile matter in the coating and ink. See b)(2)e.
d.	40 CFR Part 63, Subpart KK National Emission Standards for the Printing and Publishing Industry [§63.820- 831]	In accordance with §63.820, this emissions unit contains an existing wide web flexographic printer located at a major source of HAP. The emissions unit is exempt from the subpart according to §63.821(a)(2)(ii). See b)(2)f and c)(5)
e.	40 CFR Part 63, Subpart JJJJ National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating [§63.3280-3420]	The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture efficiency accomplished through the use of a permanent total enclosure). See b)(2)g.
f.	40 CFR Part 60, Subpart RR Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations [§60.440-60.447]	In accordance with 40 CFR 60.440, this emissions unit is a coating line used in the manufacture of pressure sensitive tape and label materials constructed before December 30, 1980. Therefore, until this emissions unit is modified or reconstructed, the requirements of Subpart RR do not apply.
g.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	Pursuant to 40 CFR 64.2(b), CAM does not apply to the MACT emission limitations for HAPs or standards in 40 CFR Part 63, Subpart JJJJ, after the compliance date in that rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The CAM requirements of 40 CFR Part 64 apply to the VOC emissions controlled by the three thermal oxidizers. See b)(2)h.

(2) Additional Terms and Conditions

a. All the coaters [I-1, (36,400 acfm); I-2, (27,000 acfm); I-3, (3,600 acfm); I-5 (37,000 acfm); and the Building 6 coater (11,200 acfm and formerly the pilot coat – PTI #02-14471)] at the Specialty Tape Division (STD) facility shall be vented to the thermal oxidizers (STD RTO 1, STD RTO 2, and TOX #5-3, or equivalent) through a manifold system of delivery.

b. The normal operating scenario for this facility during the application of solvent based coatings shall include the use of thermal oxidizers with a combined capacity of 120,000 acfm or more; however, the permittee may employ solvent based coatings when one thermal oxidizer is down provided that the combined acfm for all the coaters in use does not exceed the capacity of the operating thermal oxidizer[s].

If one thermal oxidizer is not operational, the damper monitoring system (DMS) shall divert all air flow to the remaining thermal oxidizer[s]. The permittee shall operate and maintain an emergency vent alarm system which ensures that the capacity of the remaining thermal oxidizer[s] will not be exceeded.

c. The permanent enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure (PTE) in 40 CFR Part 51, Appendix M, Reference Method 204 during routine operations when employing solvent based coatings or inks, and shall capture at least 90% of the VOC emissions from this emissions unit when employing solvent based coatings or inks.

d. A solvent based coating or ink is any coating or ink that must be vented to the thermal oxidizer.

e. A non-solvent based coating or ink is any coating or ink that is not vented to the thermal oxidizer.

f. This wide-web flexographic press is used primarily for coating, laminating, or other operations and is exempt from the requirement of 40 CFR Part 63, Subpart KK, provided that:

i. the sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure print stations and the total mass

of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print stations in each month never exceeds 5 percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations; and

ii. the records as required in §63.829(f) are maintained.

g. The complete 40 CFR Part 63 Subpart JJJJ MACT requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting Ohio EPA, Northeast District Office, Division of Air Pollution Control. The applicable Subpart JJJJ requirements are listed in c)(1), d)(1), e)(1), f)(1)(h) and f)(2) below.

63.3280	What is in this Subpart?
63.3300	Compliance deadline for affected emission sources
63.3310	Definitions
63.3320	Organic HAP emission limitations
63.3340 and Table 2	Applicable 40 CFR Part 63 Subpart A General Requirements

h. The CAM plan for this emissisn unit has been developed for VOC emissions captured by the permanent total enclosures and controlled by thermal oxidizers STD RTO 1, STD RTO 2, and TOX #5-3. The CAM performance indicators for the permanent total enclosures and thermal oxidizers controlling this emissions unit are equivalent to the capture and control requirements established in 40 CFR Part 63, Subpart JJJJ for hazardous air pollutants (HAPs). Compliance with the operational restrictions, and monitoring, record keeping and reporting requirements in 40 CFR Part 63, Subpart JJJJ for HAPs satisfies the requirements of CAM for VOC.

When the permanent total enclosures, damper monitoring system, STD RTO 1, STD RTO 2, and TOX #5-3 are operating outside the indicator ranges, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emission and comply with the reporting requirements specified in section e) below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan.

If a CAM indicator is outside of the designated range for more than 5% of the reporting period, the Director may require a Quality Improvement Plan for that CAM indicator in accordance with 40 CFR 64.8.

If the permittee identifies a failure to achieve compliance with an emissions limitation or standard for which the approved monitoring did not provide an

indication of an excursion or exceedance, the permittee shall promptly notify Ohio EPA Northeast District Office, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

i. Normal operation of each emissions unit includes employing only pressure sensitive tape and label surface coatings in the primer and/or coater. This permit includes the option to employ other pressure surface coatings in the adhesive coater and/or primer.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3321(a) and Table 1	What operating limits must be met
63.3370(a)(4) and (5)	How to demonstrate compliance with the emission standard
63.3370(e)	Capture system and control device operating requirements
63.3370(j)	Capture and control system compliance demonstration procedures using a CPMS
63.3370(k)	Oxidizer compliance demonstration procedures
63.3370(n)	Compliance using combinations of capture and control systems
63.3370(o)	Compliance with intermittently controlled and never-controlled work stations

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart JJJJ]

(2) To demonstrate compliance with OAC rule 3745-21-09(F)(2) and OAC rule 3745-21-09(Y), the average combustion temperature within each thermal oxidizer, for any 3-hour block of time when any associated emissions unit(s) is (are) in operation and employing solvent based coatings, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

[Authority for term: OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(A)(1)]

(3) Based on the application for this emissions unit, when employing solvent based coatings, this coating line shall be enclosed such that at least 90% of all VOC emissions are captured, contained, and vented to the thermal oxidizers. By not later than March 2003, compliance with the following criteria, as specified in USEPA Method 204, shall be met by the permittee during routine operations when employing solvent based coatings:

a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling;

c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters/hr (200fpm). The direction of air flow through all NDOs shall be into the entire enclosure; and

d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 21-10(C)(3)(c)]

(4) When this emissions unit is in operation and employing solvent based coatings, the permanent enclosure shall be maintained under negative pressure at all times during routine operations. Routine operations shall include all operations other than those that require an employee to briefly enter the enclosure for quick cleaning, quality control, or coating change.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(5) The permittee shall operate this emissions unit such that the sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other material applied by the printing operation using product and packaging rotogravure work stations or wide web flexographic press, in each month shall never exceed 5 weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied at all coating stations in the emissions unit in that month, including all inboard and outboard stations, as described in Section 63.821(A).

In the event that the percent of the total mass as described above is in excess of 5%, this coating line shall no longer be exempted from 40 CFR Part 63, Subpart KK

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR §63.821(A)]

(6) The following work practices apply to organic solvent cleaning materials used outside the permanent enclosure where emissions to the atmosphere are not controlled by an approved emission control system with an overall control efficiency of at least 90%.

For emissions from the use of organic solvents for cleanup, the permittee shall:

a. store all VOC-containing cleaning materials and used shop towels in closed containers;

b. ensure that mixing and storing containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;

c. minimize spills of VOC-containing cleaning materials;

d. convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

e. minimize VOC emissions, from cleaning storage, mixing, and conveying equipment.

The permittee shall post copies of these requirements around dip tanks and storage tanks and shall conduct training about these requirements.

[Authority for Term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(F)(2)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and recordkeeping requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3350(a)	Summary of control device and capture system monitoring
63.3350(b)	Monitoring required after date of initial performance test
63.3350(c)	Bypass mode monitoring by flow control position indicator
63.3350(e)(1) through (9)	Continuous parametric monitoring for thermal oxidizers
63.3350(f)	Site-specific capture system monitoring plan requirements
63.3410	Recordkeeping

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) To demonstrate compliance with OAC rule 3745-21-09(F)(2) and OAC rule 3745-21-09(Y), the permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal oxidizer when any associated emissions unit(s) is (are) in operation and employing solvent based coatings or inks. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which any average combustion temperature within each thermal oxidizer, when any associated emissions unit was in operation and employing solvent based coatings or inks, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. a log or record of the downtime for the capture (collection) system, control devices, and monitoring equipment, when the associated emissions unit was in operation and employing solvent based coatings or inks; and

c. a record of all periods of time during which solvent based coatings or inks were employed, but the VOC emissions were not vented to one or both of the thermal oxidizers.

To the extent the above monitoring and recordkeeping requirements are also contained in 40 CFR Part 63 Subpart JJJJ, compliance with Subpart JJJJ shall be deemed compliance with this permit term.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(l)]

(3) The permittee shall operate, and maintain monitoring devices and recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated,and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential specified in this permit, as a 3-hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation and the type of material being employed, i.e., solvent or non-solvent based coatings and inks.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall collect and record daily the following information for each non-solvent based coating and ink employed in these emissions units:

a. the name and identification number of each coating and ink applied;

b. the number of gallons of each coating material employed, as applied;

c. the coating or ink type and location in the line employed, i.e., non-solvent based coating employed in the printer, non-solvent based pressure sensitive tape and label surface coating employed in the adhesive coater and/or primer, or all other non-solvent based pressure surface coating employed in the adhesive coater and/or primer;

d. for all non-solvent based coatings employed in the adhesive coater and/or primer, the VOC content in pounds of VOC per pound of coating;

e. for non-solvent based coatings and inks employed in the printing station, the percent VOC by volume of the coating or ink, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating or ink.

The VOC content recorded above shall be calculated according to the respective methods specified in section f)(2) and the methods specified in OAC rule 3745-21-09(B).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)]

(5) The permittee shall perform monthly checks of the storage area for all VOC-containing cleaning materials and used shop towels and cleaning storage, mixing, and conveying equipment to ensure continuing compliance with the work practice standards applicable to organic solvent cleaning materials used outside the permanent total enclosure.

Records shall be kept of each monthly check, and shall include any corrective actions taken by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(6) The permittee shall maintain records as required in 40 CFR Part 63, Subpart KK, section 63.829(f).

In order to qualify for the exemption from the MACT requirements as described in 63.821(a)(2)(ii)(A), the permittee shall maintain the following records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f)(1) and (f)(2) for five years and submit them to the Director upon request:

a. the total mass of all materials, including inks, coatings, varnishes, adhesives, primers, solvents, thinners, and reducers, applied at product and packaging rotogravure stations and wide web flexographic stations in each month, including all inboard and outboard stations; and

b. the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers applied at all coating stations in the emissions unit each month;

c. the ratio of total mass of all materials applied by the printing operation using product and packaging rotogravure stations and wide web flexographic presses compared to the total mass of all materials used in the emissions unit, i.e., a/b x 100%; and

d. confirmation that all coaters are stand-alone equipment as defined in the rule.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.829]

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3400(a)	General requirement to submit notifications and Reports
63.3400(b)	Initial Notification Requirements
63.3400(c)	Semi-annual compliance report requirements
63.3400(d)	Notification of Performance Test requirements
63.3400(e)	Notification of Compliance Status requirements

63.3400(f)	Performance test report requirements
63.3400(g)	Startup, shutdown and malfunction report requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) To demonstrate compliance with OAC rule 3745-21-09(F)(2) and OAC rule 3745-21-09(Y), the permittee shall submit quarterly summary reports that identify the following information:

a. all 3-hour blocks of time during which the average combustion temperature within each thermal oxidizer does not comply with the temperature limitation specified in c)(2) above;

b. all periods of downtime for the capture (collection) system, control device, monitoring equipment, when the associated coating or printing line was operating and employing solvent based coatings or inks;

c. all periods of time when the stack that bypasses the thermal oxidizers is used while employing solvent based coatings or inks in this emissions unit; and

d. all 3-hour blocks of time, when the emissions unit was in operation and solvent based coatings employed, during which the permanent total enclosure was not maintained at the minimum pressure differential, at any natural draft opening, as required in this permit.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(m)]

(3) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing that the VOC content of any non-solvent based coating or ink, that is subject to OAC rule 3745-21-09(Y)(1), exceeded the applicable limitations of 40% VOC by volume of the coating or ink, excluding water and exempt solvents, and 25% VOC by volume of the volatile matter in the coating or ink.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the 5% limit (the ratio of the total mass of all materials applied by the printing operation using product and packaging rotogravure work stations or wide web flexographic compared to the total mass of all materials applied in the emissions unit). This 5% limit exempts this printing operation from the requirements of the MACT standard as described in 40 CFR Part 63, Subpart KK, section 63.821(a)(2)(ii)(A).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart KK]

(5) The permittee shall submit quarterly summaries of the daily inspections and weekly velocity or pressure drop measurements for the permanent total enclosure required under d)(2). The summaries shall identify the days when the permanent total enclosure was not functioning properly, the cause(s) for the improper operation, and corrective actions taken. The quarterly summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

For all solvent based coatings employed in the adhesive coater and/or primer, at least 90% overall reduction of VOC, by weight.

Applicable Compliance Method:

Demonstrating compliance with the capture and destruction efficiencies standards in 40 CFR Part 63, Subpart JJJJ for HAP emissions shall be sufficient to demonstrate compliance with this standard. If required, compliance shall be demonstrated using the methods in 40 CFR Part 60, Appendix A, Methods 25, 25A, and 40 CFR Part 51, Appendix M, Method 204, and the requirements in OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(C)]

b. Emission Limitation:

For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer that are not subject to OAC rule 3745-21-09(Y)(1) and that are not controlled by the thermal oxidizer, 0.067 lb VOC/ lb of coating.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5) and the testing methods specified in f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(B)]

c. Emission Limitation:

For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer that are not subject to OAC rule 3745-21-09(Y)(1) and that are not controlled by the thermal oxidizer, 0.08 lb VOC / lb of coating.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5) and the testing methods specified in f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(B)]

d. Emission Limitation:

For the non-solvent based coatings and inks employed in the printing station that are not vented to the thermal oxidizer, the VOC contents of the coatings and inks shall not exceed 40% VOC, by volume, of the coating and ink, excluding water and exempt solvents, or 25% VOC, by volume, of the volatile matter in the coating and ink

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4) and the testing methods specified in f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(B)]

e. Emission Limitation:

For all the solvent based coatings and inks employed in the printing station, VOC capture efficiency that is at least 65%, by weight, and a control efficiency that is at least 90%, by weight.

Applicable Compliance Method:

Demonstrating compliance with the capture and destruction efficiencies standards in 40 CFR Part 63, Subpart JJJJ for HAP emissions shall be sufficient to demonstrate compliance with these standards. If required, compliance shall be demonstrated using the methods in 40 CFR Part 60, Appendix A, Methods 25, 25A, and 40 CFR Part 51, Appendix M, Method 204, and the requirements in OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-10(C)]

f. Emission Limitation:

The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture efficiency accomplished through the use of a permanent total enclosure).

Applicable Compliance Method:

The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3360(a)(2)	Performance test requirement summary
63.3360(b)	Alternate compliance demonstrations for sources using control device to comply with emission limitation
63.3360(e)	Control device efficiency performance testing
63.3360(e)(1)	Oxidizer control efficiency demonstration
63.3360(e)(2)	Process information required during testing
63.3360(e)(3)	Oxidizer operating temperature requirements
63.3360(f)	Capture efficiency demonstration for permanent total enclosure
63.3400(d)	Notification of Performance Test requirements
63.3400(f)	Performance test report requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) USEPA Method 24 or Method 24A shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine the VOC contents for all coatings and inks. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A. Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of ready to use and experimental coatings if the amount of a specific formulation of a ready to use or an experimental coating used, is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24.

The amount of experiment coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Appendix A, Method 24]

(3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emissions testing shall be conducted within five (5) years of the last test date and every 5 years thereafter, unless otherwise required by the Ohio EPA Northeast District Office.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation and destruction efficiency limitation for VOC of 90%, respectively, and the 65% capture efficiency limitation for the printing station.

c. The following test methods shall be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC:

Method 25 of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and

Method 204 of 40 CFR Part 51 Appendix M.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The tests shall be conducted while the emissions unit is operating at typical operating conditions, to determine compliance with the destruction efficiency and capture efficiency limitations, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

e. After March 2003, the capture efficiency shall be determined using Methods 204 through Method 204F, as specified 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA Northeast District Office will consider the request for the use of an alternative method, including an evaluation of the applicability, necessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)

f. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

h. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

j. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10, and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -P065 - P073 Weigh Stations: P065,P073,

EU ID	Operations, Property and/or Equipment Description
P065	Material weigh stations 205-1, 205-2, and 205-3
P073	A bulk churn, drum and pail adhesive/coating weigh station venting to thermal oxidizer for emission control (weigh station 205-02)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from this emissions unit shall not exceed the following: 1.65 pounds of organic compounds (OC) per hour; 39.6 pounds of OC per day; and 7.23 tons of OC per year. See b)(2)a.

(2) Additional Terms and Conditions

a. Hourly and daily monitoring, record keeping and reporting requirements for OC are not required by this permit.

b. Based on the maximum capacities of all the equipment and an estimate of OC emissions using emission factors from AP-42, Section 4.6 on solvent degreasing, the actual OC emissions could not exceed the allowable emission rates established by PTI 02-7687.

c. BAT for this emissions unit includes the OC emission limitations specified above and the venting of the weigh station exhaust fan to one of the thermal oxidizers used to control emissions from the coating lines

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall keep the following records each month the mixers/weigh stations are operating:

a. the total number of batches produced in open top drums;

b. the total number of batches produced in the totes;

c. an estimate of the total monthly OC emission rate, in tons (see f)(1) for the calculation methodology); and

d. a year-to-date summation of the total monthly emissions of OCs, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21835]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21835]

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

OC emissions shall not exceed 1.65 pounds per hour.

<u>Applicable Compliance Method</u>:

The permittee uses 350-gallon totes with an open top diameter of 23 inches and a surface area of 2.88 square feet, 55-gallon drums with a diameter of 2 feet and surface area of 3.14 ft^2, and 5-gallon pails for production.

Due to the open-top nature of these weighing operations, the OC emission rate for this emissions unit (which is based on a modification of the uncontrolled emission factor for cold cleaners in solvent metal service as specified in the USEPA publication, Compliance of Air Pollutant Emission Factors, AP-42, Fourth Edition, September 1985, Section 4.6 on Solvent Degreasing, and a 50% increment to allow for volatilization and losses due to raw material transfer and pail use) is 0.12 $lb/hr\text{-}ft^2$ of OC.

Operating times for the drums and the churns are 20 minutes and 60 minutes, respectively.

The diameter and surface area of each of the above containers are as follows using the formula for surface area of A=3.14 r x r:

Drum: Diameter = 2 ft; Surface Area = 3.14 ft^2

Totes: Diameter = 23 inches; Surface Area = 2.88 ft^2

The maximum actual hourly OC emissions are calculated as follows:

[(0.12 lb/hr-ft^2) x (3.14 ft^2) x (3 drums/hr) x (actual operating hours/month) x (1 month/actual operating hours)] + [(0.12 lb/hr-ft^2) x (2.88 ft^2) x (2.88 ft^2) x (1 tote/hr) x (actual operating hours/month) x 1 month/ actual operating hours)] = lbs of OC per hour

The maximum (potential) hourly OC emissions are calculated as follows:

[(0.12 lb/hr-ft^2) x (3.14 ft^2) x (3 drums/hr) x (744 potential hours/month) x 1 month/744 hours] + [(0.12 lb/hr-ft^2) x (2.88 ft^2) x (1 tote/hr) x (744 hours/month) x 1 month/744 potential hours)] = 1.48 lbs of OC per hour.

Changes to vessels that increase the open top surface area or usage will require adjustments to the emission factor in accordance with the above-mentioned calculation procedure.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21835]

b. Emission limitation:

OC emissions shall not exceed 39.6 pounds per day.

Applicable Compliance Method:

Because this limit was established by multiplying the short-term limit of 1.65 lbs of OC per hour by 24 hours of operation per day, compliance with the daily limit is assumed provided that compliance with the hourly limit is maintained.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21835]

c. Emission Limitation:

OC emissions shall not exceed 7.23 tons per year.

Applicable Compliance Method:

Because this limit was established by multiplying the short-term of 1.65 lbs of OC per hour by 8760 hours of operation per year and then dividing by 2000 lbs/ton, compliance with the annual limit is assumed, but shall be confirmed by the record keeping requirements specified in d)(1)d.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-21835]

g) Miscellaneous Requirements

(1) None.