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

4/30/2014

Certified Mail

David Bullard
Troy Laminating and Coating, Inc.
421 S. UNION ST.
Troy, OH 45373-0421

Facility ID: 0855140077
Permit Number: P0111918
County: Miami

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 3/17/2014. 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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

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: Regional Air Pollution Control Agency

Response to Comments

Facility ID:	0855140077
Facility Name:	Troy Laminating and Coating, Inc.
Facility Description:	paper, coated and laminated
Facility Address:	421 S. UNION ST. TROY, OH 45373-0421 Miami County
Permit:	P0111918, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Troy Daily News on 03/19/2014. The comment period ended on 04/18/2014.	
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. No comments received

a. Comment: None

b. Response: None

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Troy Laminating and Coating, Inc.

Facility ID:	0855140077
Permit Number:	P0111918
Permit Type:	Renewal
Issued:	4/30/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Troy Laminating and Coating, Inc.

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Authorization

Facility ID:	0855140077
Facility Description:	paper, coated and laminated
Application Number(s):	A0045554
Permit Number:	P0111918
Permit Description:	Title V permit renewal for a wide web paper and film coating facility.
Permit Type:	Renewal
Issue Date:	4/30/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0092370

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

Troy Laminating and Coating, Inc.
421 S. UNION ST.
TROY, OH 45373-0421

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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 Regional Air Pollution Control Agency. 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 Regional Air Pollution Control Agency. 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 Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(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 Regional Air Pollution Control Agency) 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 Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency 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 theRegional Air Pollution Control Agency.

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 Regional Air Pollution Control Agency. 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 Regional Air Pollution Control Agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the 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. 40 CFR Part 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating

   The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart JJJJ, in accordance with 40 CFR Part 63, Subpart JJJJ (including the Table(s) and Appendix(ices). The applicable sections of the rule are identified in Section C. for each emissions unit.

   The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart JJJJ:

   K004, K005, K007 and K010

3. 40 CFR Part 63, Subpart A

   The permittee is subject to the general requirements specified in 40 CFR Part 63, Subpart A in accordance with 40 CFR Part 63, Subpart A (including the Table(s) and Appendix(ices) referenced in Subpart A). The applicable general provisions are identified in Table 1 of 40 CFR Part 63, Subpart KK and Table 2 of 40 CFR Part 63, Subpart JJJJ.

4. 40 CFR Part 63, Subpart KK - National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry

Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
40 CFR 63.821(a)(2)(ii)	Exclusion criteria for coating, laminating or other operations
40 CFR 63.829(f)	Record keeping requirements for compliance with 40 CFR 63.821(a)(2)
40 CFR 63.821(b)	Maximum ink or hazardous air pollutant (HAP) use thresholds for affected sources only subject to record keeping and reporting
40 CFR 63.829(e)	Record keeping requirements for compliance with 40 CFR 63.821(b)
40 CFR 63.830(b)(1)	Reporting requirements for compliance with 40 CFR 63.821(b)
40 CFR 63.821(c)	Compliance requirements if 40 CFR 63.821(b) thresholds are exceeded

   The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart KK:

   K004 and K010.

5. Overall volatile organic compound (VOC) emissions from this facility shall not exceed 495 tons per year.

   In accordance with PTI 08-01418 and 40 CFR Part 51, Appendix S, an emission offset interpretive limit of 495 tons per year of VOC was established for this facility to prevent exceedances of National Ambient Air Quality Standards (NAAQS).

6. The following insignificant emissions units are located at this facility:

B007 - 8.66 MMBtu natural gas-fired boiler
B008 - 8.66 MMBtu natural gas-fired boiler
B009 - 6.28 MMBtu natural gas-fired boiler
B010 - 6.28 MMBtu natural gas-fired boiler
P009 - Jaygo Dissolver, PTI 08-03249
P010 - Cowles Dissolver, PTI 08-03249
T001 - 9,000-gallon solvent storage tank
P017 - Machine parts cold cleaner
P018 - Paper breakers
P019 - Glue mixers.

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 the identified Permit to Install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

C. Emissions Unit Terms and Conditions

1. K004, #11 COATER

Operations, Property and/or Equipment Description:

11 Coater - paper coating line with flexographic printing station - uncontrolled

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)	The volatile organic compound (VOC) content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon excluding water and exempt solvents.
b.	OAC rule 3745-21-09(Y)	See b)(2)a.
c.	40 CFR Part 63 Subpart KK: NESHAP for Printing and Publishing Industry [40 CFR 63.821]	See Section B.4., d)(5) and f)(1)c.
d.	40 CFR Part 63 Subpart JJJJ: NESHAP for Paper and Other Web Coating [40CFR 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average. See b)(2)b., d)(4), e)(3) and f)(1)d.
e.	40 CFR Part 63, Subpart A: NESHAP - General Provisions	See Section B.3. of this permit Table 1 of 40 CFR Part 63, Subpart KK and Table 2 to 40 CFR Part 63, Subpart JJJJ.

(2) Additional Terms and Conditions

a. The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year, and therefore, are exempt from the requirements of OAC rule 3745-21-09(Y)(1), per OAC rule 3745-21-09(Y)(2)(b).

b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart JJJJ.

The final rules found in 40 CFR Part 63, Subpart JJJJ establish emission limitations for hazardous air pollutants (HAP), operating limits and compliance requirements for paper and other web coating operations.

The affected source is the collection of all paper and other web coating lines at the facility. The permittee became subject to the requirements and limitations of this NESHAP on December 5, 2005, at which time the initial compliance period began for the coating operations.

The permittee shall maintain this emissions unit in compliance with the applicable emission limitation in 40 CFR 63.3320 at all times. The permittee has chosen the "as applied compliant coating material" to demonstrate compliance for this emissions unit in accordance with the procedures of 40 CFR 63.3370 at all times.

[Authority for term 40 CFR 63.3320 and 40 CFR 63.3370]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day this emissions unit is in operation:

a. The name and identification number of each coating applied.

b. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents (calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$, in pounds VOC/gallon of coating).

c. The volume, in gallons, of each coating applied.

[Authority for term OAC rules 3745-21-09(F) and -77-07(C)]

(2) The permittee shall collect and record the following information each month for this emissions unit

a. The company identification for each coating, flexographic ink, thinner and cleanup material employed.

b. The volume, in gallons, of each coating, flexographic ink, thinner and cleanup material employed.

c. The VOC content of each coating, flexographic printing ink, thinner and cleanup material, in pounds per gallon.

d. The VOC emission rate for all coatings, flexographic inks, thinners and cleanup materials, in pounds or tons per month [d)(2)b. x d)(2)c.].

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

[Authority for term OAC rule 3745-77-07(A)(3)]

(3) The permittee shall collect and record the following information each month for the flexographic printing stations on this emissions unit:

a. The identification of each ink applied;

b. The volume, in gallons, of each ink applied;

c. The density, in pounds per gallon, of ink, as applied;

d. The weight, in tons, of all flexographic inks applied (the sum of d)(3)b. x d)(3)c. for all coatings and inks applied divided by 2,000 pounds per ton);

[Authority for term OAC rules 3745-21-09(Y) and 77-07(A)(3)]

(4) Per 40 CFR 63.3370(a)(6) affected sources (facilities) using a combination of compliant coatings and control devices to demonstrate compliance with 40 CFR 63.3320(b)(3) shall follow the procedures set out in 40 CFR 63.3370(f) according to 40 CFR 63.3370(n). The coating operations on this emissions unit are uncontrolled, therefore, the capture and control requirements of 40 CFR 63.3370(f) are not applicable. According to 40 CFR 63.3370(n) the permittee shall collect and record the following information each month for this emissions unit.

The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

40 CFR 63.3370(n)(4)	Determination of organic HAP applied
40 CFR 63.3370(n)(5)	Convert information to units of select compliance option

[Authority for term 40 CFR 63.3370(n)(4) and (n)(5)]

(5) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart KK, including the following sections:

40 CFR 63.829(f)	Record keeping for excluded resources

[Authority for Term 40 CFR 63.829(f)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded 2.9 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the

Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-21-09(B)]

(2) The permittee shall submit annual reports that summarize the actual annual organic compound (OC) and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Title V Fee Emission Report.

[Authority for term OAC rule 3745-77-07(A)(3)]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

40 CFR 63.3400(c)	Semiannual compliance reports

[Authority for term 40 CFR 63.3400(c)]

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) shall be determined in accordance with the following methods:

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

The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

<u>Applicable Compliance Method</u>:

For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

U.S. EPA Reference Method 24 of 40 CFR Part 60 Appendix A shall be used to determine the VOC contents for all other coatings and inks. If, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

[Authority for term OAC rules 3745-77-07(C) and 3745-21-04(B)(5)]:

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

The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(3) of this permit and shall be the sum of all flexographic printing ink used at the facility for the calendar year.

[Authority for term OAC rules 3745-21-09(Y) and 77-07(C)]

c. Emission Limitation:

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 work 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 five weight-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.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(5) according to the requirements of 40 CFR 63.829(f).

[Authority for term 40 CFR 63.829(f)]

d. Emission Limitation:

The organic HAP emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(3). The organic HAP content, of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(c). The VOC content and coating solids content of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(d).

[Authority for term 40 CFR 63.3360(c)]

g) Miscellaneous Requirements

(1) None.

2. K005, #16 COATER

Operations, Property and/or Equipment Description:

#16 Coater - paper or film coating line with permanent total enclosure and thermal incinerator

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) (PTI 08-210)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2,750 pounds per day and 97.0 tons per year
b.	OAC rule 3745-21-09(F)	The (VOC) content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC/gallon, excluding water and exempt solvents when the thermal incinerator is not employed.
c.	OAC rule 3745-21-09(B)(6)	As an alternative to compliance with the requirements of OAC rule 3745-21-09(F); the overall VOC emissions from this emissions unit shall be reduced by 81% by weight and the minimum destruction efficiency of the thermal incinerator shall be at least 90%.
d.	40 CFR Part 63, Subpart JJJJ: NESHAP for Paper and Other Web Coating [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average. See b)(2)a. and b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63, Subpart A: NESHAP - General Provisions	See Section B.3. of this permit and Table 2 to 40 CFR Part 63, Subpart JJJJ.
f.	40 CFR Part 64 (Compliance Assurance Monitoring)	See sections c)(1), c)(2), d)(3), d)(4), d)(6) through d)(8) and e)(5) through e)(8)

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart JJJJ.

The final rules found in 40 CFR Part 63, Subpart JJJJ establish emission limitations for hazardous air pollutants (HAP), operating limits and compliance requirements for paper and other web coating operations.

The affected source is the collection of all paper and other web coating lines at the facility. The permittee became subject to the requirements and limitations of this NESHAP on December 5, 2005, at which time the initial compliance period began for the coating operations.

The permittee shall maintain this emissions unit in compliance with the applicable emissions limitation in 40 CFR 63.3320 at all times. The permittee has chosen a combination of "as applied compliant coating materials" and the use of "add on control devices". Compliance shall be determined according to the coatings analysis requirements and operating limits for emission capture systems and add-on control devices.

[Authority for term 40 CFR 63.3320, 40 CFR 63.3321 and 40 CFR 63.3330]

b. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device. If it can be demonstrated that there is no leakage between the coating application, the oven, and the control device and that the oven and control device are operated under negative pressure, they do not need to be enclosed. The permittee shall install, operate, and maintain monitoring devices in accordance with a site specific monitoring plan when the emissions unit is in operation. The minimum contents of the site-specific monitoring plan are defined in 40 CFR 63.3350(f).

The permanent total enclosure serving this emissions unit shall be maintained under negative pressure as required in this permit whenever the emissions unit is in operation and shall capture all of the VOC emissions from this emissions unit. Negative pressure shall be visually monitored using streamers, plastic flow

indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for Term 40 CFR 63.3350 and OAC rule 3745-77-07(A)(3)].

c) Operational Restrictions

(1) At any time the thermal incinerator is required to demonstrate compliance, the average temperature in the combustion chamber of the thermal incinerator in any 3- hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance. [The last emissions test that demonstrated compliance was completed on June 15, 2012, with an average combustion chamber temperature of 1,502 degrees Fahrenheit.] This minimum combustion chamber temperature is subject to revision, if emissions testing during the term of this permit demonstrates that the emissions unit is in compliance at a different combustion chamber temperature.

[Authority for term OAC rule 3745-77-07(A)(3), 40 CFR 63.3350(e), 40 CFR 63.3360(e)(3)(B), 40 CFR 63.3370(k) and 40 CFR 63.3370(n)]

(2) At any time the thermal incinerator is required to demonstrate compliance, the permanent total enclosure shall be maintained under negative pressure that is not less than 0.013 mm Hg (0.007 in. H2O), whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for term 40 CFR 63.3350(f), 40 CFR 63.3360(f), 40 CFR 63.3370(k) 40 CFR 63.3370(n), and 40 CFR 51, Appendix M, Method 204].

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that list the following information for this emissions unit:

a. The company identification of each coating, thinner and cleanup material employed.

b. The volume, in gallons, of each coating, thinner and cleanup material employed.

c. The VOC content of each coating, thinner and cleanup material employed, in pounds per gallon.

d. The uncontrolled VOC emission rate for each coating, thinner and cleanup material employed, in pounds [d)(1)b. x d)(1)c.].

e. At any time the thermal incinerator is required to demonstrate compliance, the total controlled VOC emission rate from all the coatings, thinners and cleanup materials vented to the thermal incinerator, in pounds, [d)(1)d. x (1-CE*)] .

f. At any time the thermal incinerator is not required to demonstrate compliance, the VOC content of each surface coating as applied, in pounds per gallon, excluding water and exempt solvents (calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$, in pounds VOC/gallon of coating).

*CE is the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.

[Authority for term PTI 08-210 and OAC rules 3745-21-09(F) and 77-07(A)(3).

(2) The permittee shall maintain monthly records of the following information for this emissions unit:

a. The uncontrolled VOC emissions rate from all compliant coatings, thinners and cleanup materials, in tons (the sum of the daily emissions rates calculated according to d)(1)d. above for all materials employed when the thermal incinerator was not required for compliance).

b. The controlled VOC emissions rate for all coatings applied when the thermal incinerator was required to demonstrate compliance, in tons, (the sum of the daily emissions rates from d)(1)e. above when the thermal incinerator was in use).

c. The total VOC emissions rate for all coatings applied, in tons, (the sum of d)(2)a. plus d)(2)b.).

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

[Authority for term PTI 08-210 and OAC rule 3745-77-07(A)(3)]

(3) At any time the thermal incinerator is required to demonstrate compliance, the permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the combustion chamber of the thermal incinerator (or immediately downstream of the combustion chamber before any substantial heat exchange) when the emissions unit is in operation. The temperature 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; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained during the performance test that demonstrated compliance; and

b. a log of the downtime for the capture (collection) system, thermal incinerator, and/or monitoring equipment when the associated emissions unit was in operation.

[Authority for term OAC rule 3745-77-07(A)(3) and 40 CFR 64.3(a) and (c)]

(4) At any time the thermal incinerator is required to demonstrate compliance, the permittee shall perform daily inspections of the permanent total enclosure to ensure that the following conditions are being maintained when the emissions unit is in operation:

a. all access doors and windows that are not natural draft openings are closed; and

b. the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

Records shall be maintained of the results of each daily inspection and shall include any corrective actions taken by the permittee.

[Authority for term OAC rule 3745-77-07(A)(3) and 40 CFR 64.3(a) and (c)]

(5) The permittee shall install, operate, and maintain monitoring devices and a 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, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

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

a. all three-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 of 0.007 inches of water, as a three-hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for term OAC rule 3745-77-07(A)(3) and 40 CFR 64.3

(6) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

40 CFR 63.3350(e)	operate and maintain a continuous parameter monitoring system (CPMS)
40 CFR 63.3350(f)	site-specific monitoring plan for each capture system and control device
40 CFR 63.3370(k)	oxidizer compliance demonstration

40 CFR 63.3370(n)	capture and control system compliance demonstration
40 CFR 63.3340	develop and implement a written startup, shutdown, and malfunction plan (SSMP)
40 CFR 63.10(b)	general record keeping and reporting requirements

[Authority for term 40 CFR 63.3350(e), 40 CFR 63.3350(f), 40 CFR 63.3370(k), 40 CFR 63.3370(n), 40 CFR 63.10(b) and 40 CFR 63.3340]

(7) Operation of approved monitoring.

a. Commencement of operation. The owner or operator shall conduct the monitoring required under 40 CFR Part 64 upon issuance of a Part 70 or 71 permit that includes such monitoring.

b. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

d. Response to excursions or exceedances.

i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

e. Documentation of need for improved monitoring. After approval of monitoring under 40 CFR Part 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: 40 CFR 64.7]

(8) Quality improvement plan (QIP) requirements

a. Based on the results of a determination made under d)(6)d.ii. above, the Administrator or the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) may require the owner or operator to develop and implement a QIP. Consistent with section 64.6(c)(3) of 40 CFR Part 64, the Part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

b. Elements of a QIP:

i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(a) Improved preventive maintenance practices.

(b) Process operation changes.

(c) Appropriate improvements to control methods.

(d) Other steps appropriate to correct control performance.

(e) More frequent or improved monitoring (only in conjunction with one or more steps under d)(8)b.ii.(a) through (d) above.

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to d)(8)d.ii. above, the Administrator or the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

i. Failed to address the cause of the control device performance problems; or

ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[Authority for term: 40 CFR 64.8]

(9) General record keeping requirements.

a. a. The owner or operator shall comply with the record keeping requirements specified in section 70.6(a)(3)(ii) of 40 CFR Part 70. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to d)(8) and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

[Authority for term: 40 CFR 64.9(b)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded 2.9 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term OAC rule 3745-77-07(A)(3)]

(2) The permittee shall submit quarterly deviation reports that identify:

a. any days when the VOC emissions from this emissions unit exceeded 2,750 pounds per day.

b. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

c. all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water;

d. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and

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(A)(3)]

(3) The permittee shall submit annual reports that summarize the actual annual OC and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Title V Fee Emission Report.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-78]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

40 CFR 63.3400(c)	Semiannual reporting requirements
40 CFR 63.3400(f)	Performance test reporting
40 CFR 63.3400(g)	Start up, shutdown and malfunction reporting

[Authority for term 40 CFR 63.3400]

(5) General reporting requirements.

a. On and after the date specified above in d)(8), the owner or operator must use monitoring that meets the requirements of 40 CFR Part 64, the owner or operator shall submit monitoring reports to the permitting authority in accordance with section 70.6(a)(3)(iii) of 40 CFR Part 70.

b. A report for monitoring under 40 CFR Part 64 shall include, at a minimum, the information required under section 70.6(a)(3)(iii) of 40 CFR Part 70 and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

iii. A description of the actions taken to implement a QIP during the reporting period as specified above in d)(8). Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[Authority for term: 40 CFR 64.9(a)]

(6) The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1,502 degrees Fahrenheit or below the average temperature recorded during the most recent performance test. The deviation reports shall be submitted in accordance with the requirements specified in Section A – Standard Terms and Conditions.

[Authority for term: 40 CFR 64.9(a)]

(7) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow, air flow in a direction leaving the enclosure. The deviation reports shall be submitted in accordance with the requirements specified in Section A – Standard Terms and Conditions.

[Authority for term: 40 CFR Part 64.9(a)]

(8) The permittee shall notify the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) upon any establishment or reestablishment of the thermal incinerator's average combustion temperature. The notification shall include the

determination of the thermal incinerator's average combustion temperature value. The notification shall be submitted within 30 days following completion of the performance test(s). This notification may be included in the report required by f)(2).

[Authority for term: 40 CFR 64.6(c)(2)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 2,750 pounds per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit.

b. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 97.0 tons per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) and shall be the sum of the monthly VOC emissions rates for the calendar year, divided by 2,000 lbs/ton.

c. Emissions Limitation:

The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 lbs VOC/gallon, excluding water and exempt solvents, when the thermal incinerator is not employed.

Applicable Compliance Method:

The permittee shall demonstrate compliance based upon the record keeping requirements specified in d)(1).

For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

If requested, U.S. EPA Method 24 shall be used to determined the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision

statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

d. Emission Limitation:

The overall VOC emissions from this emissions unit shall be reduced by a minimum of 81% and a minimum 90% destruction efficiency when VOC emissions are vented to the thermal incinerator.

Applicable Compliance Method:

Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in f)(2) below and monitoring as outlined in d)(3) and d)(4).

e. Emission Limitation:

The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:

Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in f)(2) and monitoring as outlined in d)(5).

[Authority for term OAC rules 3745-77-07(C), 3745-21-09(F), and 3745-21-04(B)(5)]

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

a. The emission testing shall be conducted on a recurring 5 year schedule. (The last test that demonstrated compliance was completed on June 15, 2012).

b. The emission testing shall be conducted in order to determine:

i. the capture efficiency of the emission capture system, and the destruction efficiency of the thermal incinerator, both in percent.

ii. the minimum operating limits for the thermal incinerator by recording and calculating the average combustion temperature during emissions testing.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;

Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of each add-on control device simultaneously, using:

Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm

Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Emissions units K005 and K007 are both vented to the thermal incinerator, therefore, separate compliance testing will be required:

   i. while both emissions units are operating to determine compliance at maximum operating conditions and;

   ii. while one emissions unit is operating to establish minimum operating temperature limits.

e. Gaseous non-methane organic compound mass flow rates shall be determined simultaneously for the inlet and the outlet of the thermal incinerator for each of 3 test runs.

f. The gaseous non-methane organic compound mass flow rate, in kg/hr or pounds/hour, shall be calculated according to the procedures of 40 CFR 63.3360(e), (Equation 1).

g. For each test run the add-on control device organic emissions destruction or removal efficiency shall be calculated according to the procedures of 40 CFR 63.3360(e), (Equation 2).

h. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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.

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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

[Authority for term OAC rule 3745-77-07(C), 40 CFR 63.3360(e) and 40 CFR 63.7(b)(1)]

g) Miscellaneous Requirements

(1) The carbon adsorption emission controls listed in PTI 08-218 have been removed from this emissions unit.

[Authority for term OAC rule 3745-77-07(A)(3)]

3. K007, #18 COATER

Operations, Property and/or Equipment Description:

18 Coater - paper or film coating line with permanent total enclosure and thermal incinerator

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) (PTI 08-01416)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 72.2 pounds per hour and 77.9 tons per year. The VOC content of the coatings applied in this emissions unit without employing the thermal incinerator shall not exceed 1.0 pound VOC per gallon excluding water and exempt solvents. The VOC content of the coatings applied in this emissions unit while venting to the thermal incinerator shall not exceed 1.0 pound VOC per gallon after application of emissions control efficiency. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-21-09(F)	The emissions limitation specified in the rule is less stringent than the emissions limitation established according to OAC rule 3745-31- 05(A)(3).
c.	OAC rule 3745-21-09(B)(6)	The emissions limitation specified in the rule is less stringent than the emissions limitation established according to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart JJJJ: NESHAP for Paper and Other Web Coating [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average. See b)(2)c and b)(2)d.
e.	40 CFR Part 63, Subpart A: NESHAP - General Provisions	See Section B.3. of this permit and Table 2 to 40 CFR Part 63, Subpart JJJJ.
f.	40 CFR Part 64 (Compliance Assurance Monitoring)	See c)(1), c)(2), d)(3), d)(4), d)(6) through d)(8) and e)(8) through e)(11).

(2) Additional Terms and Conditions

a. At any time the thermal incinerator is required to demonstrate compliance, the VOC emissions from this emissions unit shall be reduced by a minimum of 86% by weight.

[Authority for term PTI 08-01416]

b. The uncontrolled VOC emissions rate from the use of compliant coatings that do not require use of the thermal incinerator for compliance in this emissions unit shall not exceed 81,146 pounds per month.

[Authority for term PTI 08-01416]

c. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart JJJJ.

The final rules found in 40 CFR Part 63, Subpart JJJJ establish emission limitations for hazardous air pollutants (HAP), operating limits and compliance requirements for paper and other web coating operations.

The affected source is the collection of all paper and other web coating lines at the facility. The permittee became subject to the requirements and limitations of this NESHAP on December 5, 2005, at which time the initial compliance period began for the coating operations.

The permittee shall maintain this emissions unit in compliance with the applicable emissions limitation in 40 CFR 63.3320 at all times. The permittee has chosen a combination of "as applied compliant coating materials" and the use of "add on control devices". Compliance shall be determined according to the coatings

analysis requirements and operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3370 at all times except during periods of startup, shutdown, and malfunction.

[Authority for term 40 CFR 63.3320 and 40 CFR 63.3370]

d. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device. If it can be demonstrated that there is no leakage between the coating application, the oven, and the control device and that the oven and control device are operated under negative pressure, they do not need to be enclosed. The permittee shall install, operate, and maintain monitoring devices in accordance with a site-specific monitoring plan when the emissions unit is in operation. The minimum contents of the site-specific monitoring plan are defined in 40 CFR 63.3350(f).

The permanent total enclosure serving this emissions unit shall be maintained under negative pressure as required in this permit whenever the emissions unit is in operation and shall capture all of the VOC emissions from this emissions unit. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for Term 40 CFR 63.3350(f) and 40 CFR 63.3360(k)]

c) Operational Restrictions

(1) At any time the thermal incinerator is required to demonstrate compliance, the average temperature in the combustion chamber of the thermal incinerator in any 3- hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance. [The most recent emissions test program that demonstrated compliance was completed on June 15, 2012, with an average combustion chamber temperature of 1,502 degrees Fahrenheit.] This minimum combustion chamber temperature is subject to revision, if emissions testing during the term of this permit demonstrates that the emissions unit is in compliance at a different combustion chamber temperature.

[Authority for term OAC rule 3745-77-07(A)(3), 40 CFR 63.3350(e), 40 CFR 63.3360(e)(3)(B), 40 CFR 63.3370(k) and 40 CFR 63.3370(n)].

(2) At any time the thermal incinerator is required to demonstrate compliance, the permanent total enclosure shall be maintained under negative pressure that is not less than 0.013 mm Hg (0.007 in. H2O), whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for term 40 CFR 63.3350(f), 40 CFR 63.3360(f), 40 CFR 63.3370(k) 40 CFR 63.3370(n), and 40 CFR 51, Appendix M, Method 204]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that list the following information for this emissions unit:

a. The company identification of each coating, thinner and cleanup material employed.

b. The volume, in gallons, of each coating, thinner and cleanup material employed.

c. The VOC content of each coating, thinner and cleanup material employed, in pounds per gallon, including water and exempt solvents.

d. The VOC content, of each coating as applied, in pounds per gallon excluding water and exempt solvents (calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$, in pounds VOC/gallon of coating).

e. At any time the thermal incinerator is required to demonstrate compliance, The VOC content after control, in pounds per gallon excluding water and exempt solvents, of the coatings that were vented to the thermal oxidizer [d)(1)d. x (CE*)]

f. The uncontrolled VOC emission rate from all the compliant coatings, in pounds [d)(1)b. x d)(1)c. when the thermal incinerator is not required to demonstrate compliance].

g. The uncontrolled VOC emission rate from coatings applied when the thermal incinerator is required to demonstrate compliance, in pounds, [d)(1)b. x d)(1)c. when the thermal incinerator is required to demonstrate compliance).

h. The controlled VOC emission rate when the thermal incinerator is required to demonstrate compliance, in pounds, [d)(1)g. x (CE)].

i. The total actual VOC emission rate from all the coatings employed, in pounds [d)(1)f. + d)(1)h.].

j. The time, in hours that the emissions unit was in operation.

k. The average hourly VOC emissions, [d)(1)j. / d)(1)k.] in pounds/hour.

*CE is the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance.

[Authority for term OAC rules 3745-21-09(F), 21-09(B)(6) and 77-07(A)(3) and PTI 08-1416]

(2) The permittee shall maintain monthly records of the following information for this emissions unit:

a. The uncontrolled VOC emissions rate from all compliant coatings, thinners and cleanup materials, in tons (the sum of the daily emissions rates calculated according to d)(1)d. above for all materials employed when the thermal incinerator was not required for compliance).

b. The controlled VOC emissions rate for all coatings applied when the thermal incinerator was required to demonstrate compliance, in tons, (the sum of the daily emissions rates from d)(1)e. above when the thermal incinerator was in use).

c. The total VOC emissions rate for all coatings applied, in tons, (the sum of d)(2)a. plus d)(2)b.).

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

[Authority for term PTI 08-01416 and OAC rule 3745-77-07(A)(3)]

(3) At any time the thermal incinerator is required to demonstrate compliance, the permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the combustion chamber of the thermal incinerator (or immediately downstream of the combustion chamber before any substantial heat exchange) when the emissions unit is in operation. The temperature 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; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained during the performance test that demonstrated compliance; and

b. a log of the downtime for the capture (collection) system, thermal incinerator, and/or monitoring equipment when the associated emissions unit was in operation.

[Authority for term OAC rule 3745-77-07(A)(3) and 40 CFR 64.3(a) and (c)]

(4) The permittee shall install, operate, and maintain monitoring devices and a 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, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

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

a. all three-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 of 0.007 inches of water, as a three-hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for term OAC rule 3745-77-07(A)(3) and 40 CFR 64.3]

(5) At any time the thermal incinerator is required to demonstrate compliance, the permittee shall perform daily inspections of the permanent total enclosure to ensure that the following conditions are being maintained when the emissions unit is in operation:

a. all access doors and windows that are not natural draft openings are closed; and

b. the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

Records shall be maintained of the results of each daily inspection and shall include any corrective actions taken by the permittee.

[Authority for term OAC rule 3745-77-07(A)(3) and 40 CFR 64.3(a) and (c)]

(6) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

40 CFR 63.3350(e)	operate and maintain a continuous parameter monitoring system (CPMS)
40 CFR 63.3350(f)	site-specific monitoring plan for each capture system and control device
40 CFR 63.3370(k)	oxidizer compliance demonstration
40 CFR 63.3370(n)	capture and control system compliance demonstration
40 CFR 63.3340	develop and implement a written startup, shutdown, and malfunction plan (SSMP)
40 CFR 63.10(b)	general record keeping and reporting requirements

[Authority for term 40 CFR 63.3350(e), 40 CFR 63.3350(f), 40 CFR 63.3370(k), 40 CFR 63.3370(n), 40 CFR 63.10(b) and 40 CFR 63.3340]

(7) Operation of approved monitoring.

a. Commencement of operation. The owner or operator shall conduct the monitoring required under 40 CFR Part 64 upon issuance of a Part 70 or 71 permit that includes such monitoring.

b. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions,

associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

d. Response to excursions or exceedances.

i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

e. Documentation of need for improved monitoring. After approval of monitoring under 40 CFR Part 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: 40 CFR 64.7]

(8) Quality improvement plan (QIP) requirements.

a. Based on the results of a determination made under d)(6)d.ii., the Administrator or the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) may require the owner or operator to develop and implement a QIP. Consistent with section 64.6(c)(3) of 40 CFR Part 64, the Part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

b. Elements of a QIP:

i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(a) Improved preventive maintenance practices.

(b) Process operation changes.

(c) Appropriate improvements to control methods.

(d) Other steps appropriate to correct control performance.

(e) (e) More frequent or improved monitoring (only in conjunction with one or more steps under sections d)(8)b.ii.(a) through (d) above.

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to d)(8)d.ii. above, the Administrator or the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

i. Failed to address the cause of the control device performance problems; or

ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[Authority for term: 40 CFR 64.8]

(9) General record keeping requirements.

a. The owner or operator shall comply with the record keeping requirements specified in section 70.6(a)(3)(ii) of 40 CFR Part 70. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to section d)(8) of this permit and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

[Authority for term: 40 CFR 64.9(b)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of non-complying coatings in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term OAC rule 3745-77-07(A)(3)]

(2) The permittee shall submit quarterly deviation reports that identify:

a. all exceedances of the monthly VOC emission limitation of 81,146 pounds for compliant coatings;

b. all exceedances of the of 72.2 pounds VOC per hour emissions limitation;

c. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature

maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

d. all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water;

e. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and

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(A)(3)]

(3) The permittee shall submit annual reports that summarize the actual annual OC and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Title V Fee Emission Report.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-78]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

40 CFR 63.3400(c)	Semiannual reporting requirements
40 CFR 63.3400(f)	Performance test reporting
40 CFR 63.3400(g)	Start up, shutdown and malfunction reporting

[Authority for term 40 CFR 63.3400]

(5) Performance test results for the emission capture system(s) and add-on control device(s) shall be submitted no later than 30 days after completion of the performance test(s). Results of each performance test shall include the analysis of samples, determination of emissions, and the supporting raw data. Performance testing results shall be retained for a minimum of 5 years from the test date and shall be made available to the director, or representative of the director, upon request.

[Authority for term 40 CFR 63.7(g), 40 CFR 63.3400(f) and OAC rule 3745-15-04(A)]

(6) General reporting requirements.

a. On and after the date specified in d)(6) the owner or operator must use monitoring that meets the requirements of 40 CFR Part 64, the owner or operator shall submit monitoring reports to the permitting authority in accordance with section 70.6(a)(3)(iii) of 40 CFR Part 70.

b. A report for monitoring under 40 CFR Part 64 shall include, at a minimum, the information required under section 70.6(a)(3)(iii) of 40 CFR Part 70 and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

iii. A description of the actions taken to implement a QIP during the reporting period as specified in d)(8). Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[Authority for term: 40 CFR 64.9(a)]

(7) The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation when the thermal incinerator was required to demonstrate compliance and the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1,502 degrees Fahrenheit or below the average temperature recorded during the most recent performance test. The deviation reports shall be submitted in accordance with the requirements specified in Section A - Standard Terms and Conditions.

[Authority for term: 40 CFR 64.9(a)]

(8) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the thermal incinerator was required to demonstrate compliance and the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow, air flow in a direction leaving the enclosure. The deviation reports shall be submitted in accordance with the requirements specified in Section A - Standard Terms and Conditions.

[Authority for term: 40 CFR Part 64.9(a)]

(9) The permittee shall notify the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) upon any establishment or reestablishment of the thermal incinerator's average combustion temperature. The notification shall include the determination of the thermal incinerator's average combustion temperature value. The notification shall be submitted within 30 days following completion of the performance test(s). This notification may be included in the report required by f)(2).

[Authority for term: 40 CFR 64.6(c)(2)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 72.2 pounds per hour.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

[Authority for term OAC rule 3745-77-07(C) and PTI 08-1416]

b. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 77.9 tons per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) and shall be the sum of the monthly VOC emissions for the calendar year, divided by 2,000 lbs/ton.

[Authority for term OAC rule 3745-77-07(C) and PTI 08-1416]

c. Emissions Limitation:

The uncontrolled VOC content of the coating applied in this emissions unit shall not exceed 1.0 lbs VOC/gallon, excluding water and exempt solvents.

Applicable Compliance Method:

The permittee shall demonstrate compliance based upon the record keeping requirements specified in d)(1).

For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

If requested, U.S. EPA Method 24 shall be used to determined the VOC contents for coatings. If, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

[Authority for term OAC rules 3745-77-07(C), 3745-21-09(F) and 3745-21-04(B)(5)]

d. Emission Limitation:

At any time the thermal incinerator is required to demonstrate compliance, the VOC emissions from this emissions unit shall be reduced by a minimum of 86% by weight.

Applicable Compliance Method:

Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in f)(2) and monitoring as outlined in d)(3)

[Authority for term OAC rule 3745-77-07(C) and PTI 08-1416]

e. Emissions Limitation:

The controlled VOC content of the coating applied in this emissions unit shall not exceed 1.0 lbs VOC/gallon, excluding water and exempt solvents when the emissions unit is venting to the thermal incinerator.

Applicable Compliance Method:

Compliance will be based on the record keeping requirements specified in d)(1) and emissions testing requirements specified in f)(2).

U.S. EPA Method 24 shall be used to determine the uncontrolled VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 63.3370]

f. Emissions Limitation:

The uncontrolled VOC emissions from the use of compliant coatings that do not require use of the thermal incinerator for compliance in this emissions unit shall not exceed 81,146 pounds per month.

Applicable Compliance Method:

Compliance will be based on the record keeping requirements of d)(1) and the sum of the daily coatings use records for each day of the calendar month.

g. Emission Limitation:

The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:

Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in f)(2) and monitoring as outlined in d)(8).

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 63.3370]

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

a. The emission testing shall be conducted on a recurring 5 year schedule. (The last test that demonstrated compliance was completed on June 15, 2012).

b. The emission testing shall be conducted in order to determine:

i. the capture efficiency of the emission capture system, and the destruction efficiency of the thermal incinerator, both in percent.

ii. the minimum operating limits for the thermal incinerator by recording and calculating the average combustion temperature during emissions testing.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;

Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of each add-on control device simultaneously, using:

Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm

Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Emissions units K005 and K007 are both vented to the thermal incinerator, therefore, separate compliance testing will be required:

   i. while both emissions units are operating to determine compliance at maximum operating conditions and;

   ii. while one emissions unit is operating to establish minimum operating temperature limits.

e. Gaseous non-methane organic compound mass flow rates shall be determined simultaneously for the inlet and the outlet of the thermal incinerator for each of 3 test runs.

f. The gaseous non-methane organic compound mass flow rate, in kg/hr or pounds/hour, shall be calculated according to the procedures of 40 CFR 63.3360(e), (Equation 1).

g. For each test run the add-on control device organic emissions destruction or removal efficiency shall be calculated according to the procedures of 40 CFR 63.3360(e), (Equation 2).

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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.

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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

[Authority for term OAC rule 3745-77-07(C), 40 CFR 63.3360(e) and 40 CFR 63.7(b)(1)]

g) Miscellaneous Requirements

(1) The carbon adsorption emission controls listed in PTI 08-1416 have been removed from this emissions unit.

[Authority for term OAC rule 3745-77-07(A)(3)]

4. K010, #475 COATER

Operations, Property and/or Equipment Description:

No. 475 Coater - paper coating line with flexographic printing station - uncontrolled.

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) b)(1)h.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 08-04939)	Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-09(F), 3745-21-09(Y) and 40 CFR Part 63, Subparts KK and JJJJ.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major New Source Review provisions)	The VOC emissions from this emissions unit shall not exceed 30.0 tons on a rolling 12-month basis.
c.	OAC rule 3745-21-09(F)	The volatile organic compound (VOC) content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents, as a daily volume-weighted average.
d.	OAC rule 3745-21-09(Y)	See b)(2)a.
e.	40 CFR Part 63, Subpart KK: NESHAP for Printing and Publishing Industry [40 CFR 63.821(a)(2)(ii)(A)]	See Section B.4. b)(2)b.
f.	40 CFR Part 63, Subpart JJJJ: NESHAP for Paper and Other Web Coating [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average. See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A: NESHAP - General Provisions	See Section B.3. of this permit and Table 2 to 40 CFR Part 63, Subpart JJJJ.
h.	OAC rule 3745-114 and ORC 3704.03(F)(4)(c)	See d)(6) through d)(9) and e)(4).

(2) Additional Terms and Conditions

a. The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year, and therefore, are exempt from the requirements of OAC rule 3745-21-09(Y)(1), per OAC rule 3745-21-09(Y)(2)(b).

[Authority for Term OAC rule 3745-21-09(Y)]

b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart JJJJ.

The final rules found in 40 CFR Part 63, Subpart JJJJ establish emission limitations for hazardous air pollutants (HAP), operating limits and compliance requirements for paper and other web coating operations.

The affected source is the collection of all paper and other web coating lines at the facility. The permittee became subject to the requirements and limitations of this NESHAP on December 5, 2005, at which time the initial compliance period began for the coating operations.

The permittee shall maintain this emissions unit in compliance with the applicable emission limitation in 40 CFR 63.3320 at all times. The permittee has chosen the "as applied compliant coating material" to demonstrate compliance for this emissions unit in accordance with the procedures of 40 CFR 63.3370 at all times.

[Authority for term 40 CFR 63.3320 and 40 CFR 63.3370]

c) Operational Restrictions

(1) The total VOC input from flexographic inks, coatings, thinners, and clean up material usage for this emissions unit shall not exceed 60,000 pounds on a rolling 12-month basis.

[Authority for Term OAC rule 3745-31-05(A)(3)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit.

a. The company identification for each coating, flexographic ink, thinner and cleanup material employed.

b. The volume, in gallons, of each coating, flexographic ink, thinner and cleanup material employed.

c. The VOC content of each coating, as applied, in pounds of VOC per gallon excluding water and exempt solvents.

d. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{voc,2}$.

[Authority for term OAC rules, 3745-21-09(B)(3)(h), 3745-21-10(B)(9), and 3745-77-07(A)(3)]

(2) The permittee shall collect and record the following information each month for this emissions unit.

a. The company identification for each coating, flexographic ink, thinner and cleanup material employed;

b. The volume, in gallons, of each coating, flexographic ink, thinner and cleanup material employed;

c. The VOC content of each coating, flexographic ink, thinner and cleanup material, in pounds per gallon;

d. The VOC emission rate for all coatings, flexographic inks, thinners and cleanup materials, in pounds or tons per month [d)(2)b. x d)(2)c.]; and

e. The rolling 12 month VOC emissions rate, in tons (the sum of the monthly VOC emissions rates for the previous 12 months).

[Authority for term PTI 08-04939 and OAC rule 3745-77-07(A)(3)].

(3) The permittee shall collect and record the following information each month for the flexographic printing stations on this emissions unit:

a. The identification of each ink applied;

b. The volume, in gallons, of each ink applied;

c. The density, in pounds per gallon, of ink, as applied;

d. The weight, in tons, of all flexographic coatings applied (the sum of d)(3)b. x d)(3)c. for all coatings and inks applied divided by 2,000 pounds per ton);

[Authority for term OAC rules 3745-21-09(Y) and 77-07(A)(3)]

(4) Per 40 CFR 63.3370(a)(6) affected sources (facilities) using a combination of compliant coatings and control devices to demonstrate compliance with 40 CFR 63.3320(b)(3)

shall follow the procedures set out in 40 CFR 63.3370(f) according to 40 CFR 63.3370(n). The coating operations on this emissions unit are uncontrolled, therefore, the capture and control requirements of 40 CFR 63.3370(f) are not applicable. According to 40 CFR 63.3370(n) the permittee shall collect and record the following information each month for this emissions unit.

The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

40 CFR 63.3370(n)(4)	Determination of organic HAP applied
40 CFR 63.3370(n)(5)	Convert information to units of select compliance option

[Authority for term 40 CFR 63.3370(n)(4) and (n)(5)]

(5) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart KK, including the following sections:

40 CFR 63.829(f)	Record keeping for excluded resources

[Authority for Term 40 CFR 63.829(f)]

(6) The permit-to-install (PTI), application for this emissions unit K010 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological

Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant:

Toxic Contaminant: Ammonia
TLV (mg/m^3): 17.382
Maximum Hourly Emission Rate (lbs/hr): 2.00
Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 188
MAGLC ($\mu g/m^3$): 414

The permittee, has demonstrated that emissions of ammonia, from emissions unit K010, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

[Authority for term OAC rule 3745-114]

(7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term OAC rule 3745-114]

(8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

[Authority for term OAC rule 3745-114]

(9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term OAC rule 3745-114]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

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

(2) The permittee shall submit annual reports that summarize the actual annual organic compound (OC) and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Title V Fee Emission Report.

[Authority for term OAC rule 3745-77-07(A)(3)]

(3) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart JJJJ, including the following sections:

40 CFR 63.3400(c)	Semiannual compliance reports

[Authority for term 40 CFR 63.3400(c)]

(4) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[Authority for term OAC rule 3745-114]

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) shall be determined in accordance with the following methods:

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

The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based on coating formulation data and if required VOC content shall be determined according the requirements of U.S. Reference Method 24 of 40 CFR Part 60, Appendix A.

For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

[Authority for term OAC rules 3745-21-09(F) and 77-07(C)]

b. Emissions Limitation:

The VOC emissions from this emissions unit shall not exceed 30.0 tons on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(2) and the sum of the monthly emissions rates for the previous twelve months.

[Authority for term PTI 08-04939 and OAC rule 3745-77-07(C)]

c. Emissions Limitation:

The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(3) and shall be the sum of all flexographic printing ink used at the facility for the calendar year.

[Authority for term OAC rules 3745-21-09(Y) and 77-07(C)]

(2) Emissions Limitation:

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 work 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 five weight-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.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(5) according to the requirements of 40 CFR 63.829(f).

[Authority for term OAC rule 3745-77-07(C) and 63.829(f)]

(3) Emissions Limitation:

The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in d)(4). The organic HAP content, of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(c). The VOC content and coating solids content of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(d).

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 63.3360(c)]

g) Miscellaneous Requirements

(1) None.

5. P002, BALL MILLS

Operations, Property and/or Equipment Description:

Mixer - ball mills with fabric filter

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 3745-17-11(B)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 2.39 pounds per hour.
b.	OAC rule 3745-17-08	See b)(2)a.
c.	OAC rule 3745-17-07(B)	See b)(2)b.
d.	OAC rule 3745-17-07(A)	Visible PE from this emissions unit shall not exceed 20 percent opacity as a six-minute average.

(2) Additional Terms and Conditions

a. This emissions unit is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), OAC rule 3745-17-08 does not apply to this emissions unit.

b. Because OAC rule 3745-17-08 is not applicable, this emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(d)..

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring

equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for pressure drop across the baghouse is 2 to 6 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for Term: OAC rule 3745-77-07(A)(3)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following:

a. An identification of all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

These deviation (excursion) reports shall be submitted in accordance with Section A – Standard Terms and Conditions of this permit.

[Authority for Term: OAC rule 3745-77-07(A)(3)].

f) Testing Requirements

(1) Compliance with the emissions limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

The PE from this emissions unit shall not exceed 2.39 pounds per hour.

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum amount of pigment mixed in one hour (563 pounds) by an uncontrolled emission factor of 0.01 pound PE/lb pigment, as specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, section 6.4., Table 6.4-1. This uncontrolled emission rate is then multiplied by a fabric filter control efficiency of 99% (1 - 0.99) to obtain the actual controlled PE.

If required, compliance with the mass emission limitation above shall be demonstrated pursuant to the methods in OAC rule 3745-17-03(B)(10).

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

b. Emission Limitation:

Visible PE from this emissions unit shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to OAC rule 3745-17-03(B)(1).

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

g) Miscellaneous Requirements

(1) None.

6. P013, DRUM MIXER

Operations, Property and/or Equipment Description:

Drum Mixer - uncontrolled

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) (PTI 08-03249)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.0 pound per hour, 24 pounds per day and 4.38 tons per year. See b)(2)a.
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The 1.0 pound per hour and 24.0 pounds per day OC emissions limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emissions limits.

c) Operational Restrictions

(1) This emissions unit shall be equipped with a cover or otherwise be enclosed to minimize evaporative losses.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-03249].

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the coating operation:

a. The company identification for each coating mixed.

b. The weight of each coating mixed, in pounds.

c. The total amount of all the coatings mixed, in pounds.

d. The total organic compound emission rate from the coating mixing process, in pounds, calculated as follows:

total OC emissions (lbs/day) = [pounds of coating mixed per day] X (an emission factor of 0.005 pound OC per pound of coating mixed)]*

*This emission factor was developed by the permittee based upon mass balance calculations.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-3249]

e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the actual annual OC and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rules 3745-77-07(A)(3)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

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

The OC emissions from this emissions unit shall not exceed 1.0 pound per hour.

<u>Applicable Compliance Method</u>:

Compliance shall be determined by multiplying the maximum pounds of coating mixed per hour (200 pounds) by the company-developed mass balance emission factor of 0.005 pound OC per pound of coating mixed.

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

The OC emissions from this emissions unit shall not exceed 24 pounds per day.

<u>Applicable Compliance Method</u>:

Compliance shall be based upon record keeping requirements specified in d)(1).

c. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 4.38 tons per year.

Applicable Compliance Method:

Compliance shall be based upon record keeping requirements specified in d)(1) and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2000 pounds per ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-03249]

g) Miscellaneous Requirements

(1) None.

7. P014, COATING MIX TANK #6

Operations, Property and/or Equipment Description:

Coating mix tank No. 6, with thermal incinerator control

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) PTI 08-04264	The organic compound (OC) emissions from this emissions unit shall not exceed 42.12 pounds per day and 1.46 tons per year. The thermal incinerator shall achieve minimum 92% overall OC emissions reduction.
b.	OAC rule 3745-21-07(M)(1) and (2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The average temperature in the combustion chamber of the thermal incinerator in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance. [The most recent emissions test program that demonstrated compliance was conducted on June 15, 2012, with an average combustion chamber temperature of 1,502 degrees

Fahrenheit.] This minimum combustion chamber temperature is subject to revision, if emissions testing during the term of this permit demonstrates that the emissions unit is in compliance at a different combustion chamber temperature.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04264]

(2) The volume of coatings mixed in this emissions unit shall not exceed 1,640 gallons per day.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04264]

(3) The volume of coatings mixed in this emissions unit shall not exceed 113,890 gallons per year.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04264].

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator 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 monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04264]

(2) The permittee shall collect and record the following information for each day for the control equipment:

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, 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.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04264]

(3) The permittee shall maintain daily records of the following information for this emissions unit:.

a. The volume, in gallons, of coatings mixed.

b. The organic compound emission rate (see f)(1)b.), in pounds.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04264]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.

b. All exceedances on the restriction of the daily amount of coatings mixed of 1,640 gallons.

c. All exceedances of the daily OC emission limitation of 42.12 pounds.

These quarterly deviation reports shall be submitted in accordance with Section A. Standard Terms and Conditions of this permit.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04264]

(2) The permittee shall submit annual reports that summarize the actual annual OC and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(A)(3) and PTI 08-04264].

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

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

The thermal incinerator shall achieve minimum 92% overall OC emissions reduction.

<u>Applicable Compliance Method</u>:

Compliance with the destruction efficiency shall be demonstrated in accordance with the test methods and procedures specified in OAC rule 3745-21-10. Compliance with the overall OC emissions reduction efficiency requirement was demonstrated during a performance test conducted on June 15, 2012.

Compliance with the overall OC reduction limitation is presumed through the application of an enclosed mixing tank, which is inherent to the process, and venting the OC emissions to the thermal incinerator.

b. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 42.12 pounds per day.

Applicable Compliance Method:

Compliance shall be based upon record keeping requirements specified in d)(3) and shall be determined by multiplying the total gallons of coating mixed by the company-developed emission factor of 0.321 lb OC/gallon coating mixed. This uncontrolled emission rate is then multiplied by the overall control efficiency determined during the most recent emission test that demonstrated the emissions unit was in compliance.

c. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 1.46 tons per year.

Applicable Compliance Method:

Compliance shall be based upon record keeping requirements specified in d)(3) and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

Operational Limitation:

The volume of coatings mixed in this emissions unit shall not exceed 1,640 gallons per day.

Applicable Compliance Method:

Compliance shall be based upon record keeping requirements specified in section d)(3) of this permit.

d. Operational Limitation:

The volume of coatings mixed in this emissions unit shall not exceed 113,890 gallons per year.

Applicable Compliance Method:

Compliance shall be based upon record keeping requirements specified in d)(3) and shall be the sum of the daily amounts of coatings mixed for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

g) Miscellaneous Requirements

(1) None.