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

5/19/2014

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: CFF of Avery Dennison
Facility ID: 0243081207
Permit Type: Renewal
Permit Number: P0110057

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. 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. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northeast District Office

PROPOSED

Division of Air Pollution Control
Title V Permit
for
CFF of Avery Dennison

Facility ID:	0243081207
Permit Number:	P0110057
Permit Type:	Renewal
Issued:	5/19/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
CFF of Avery Dennison

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Authorization

Facility ID:	0243081207
Facility Description:	Adhesive coating operations
Application Number(s):	A0043014
Permit Number:	P0110057
Permit Description:	Title V renewal permit for adhesive coating operations including three significant emissions units (K001 - K003) all of which are paper and film coating lines.
Permit Type:	Renewal
Issue Date:	5/19/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0084966

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

CFF of Avery Dennison
5750 Heisley Road
Mentor, OH 44060

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

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

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

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

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

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

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

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

30. Submitting Documents Required by this Permit

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJ: K001, K002, and K003.

   The complete 40 CFR Part 63, Subpart JJJJ MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://efcr.gpoaccess.gov (http://efcr.gpoaccess.gov/) or by contacting the Ohio EPA Northeast District Office.

3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart RR: K001, K002, and K003.

   The complete 40 CFR Part 60, Subpart RR NSPS requirements, including the NSPS General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://efcr.gpoaccess.gov (http://efcr.gpoaccess.gov/) or by contacting the Ohio EPA Northeast District Office.

4. Subpart DDDDD – National Emissions Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

   a) Affected Sources:

      (1) According to 63.7485, 63.7490 and 63.7499, emissions units B001, B002, and B003 are existing affected sources located at a major source subject to the requirements for a boiler designed to burn natural gas with a heat input less than 10 MMBtu. These are affected sources under the final Boiler MACT rule promulgated on March 21, 2011 (40 CFR Part 63, Subpart DDDDD) subject to work practice standards specified in 40 CFR 63.7540 with a compliance date of January 31, 2016. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://efcr.gpoaccess.gov (http://efcr.gpoaccess.gov/) or by contacting the Ohio EPA Northeast District Office.

   b) Applicable Emission Limitations and /or Control Requirements

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

c) Operational Restrictions

63.7510(e)	Initial compliance demonstration date
63.7515(e)	5 year tune-up work practice every 61 months

d) Monitoring and Recordkeeping Requirements

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

e) Reporting Requirements

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

f) Miscellaneous Requirements

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

5. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21:

DAPC ID	EU Description	Applicable Rules
B001	2.016 mmBtu/hr natural gas-fired boiler associated with coating lines CF1 & CF2. CF1/CF2 Boiler.	40 CFR Part 63, Subpart DDDDD
B002	3.188 mmBtu/hr natural gas-fired boiler associated with coating line CF3. CF3 Boiler 1	40 CFR Part 63, Subpart DDDDD
B003	2.392 mmBtu/hr natural gas-fired boiler associated with coating line CF3. CF3 Boiler 2	40 CFR Part 63, Subpart DDDDD

C. Emissions Unit Terms and Conditions

1. K001, CF-1 Coating Line

Operations, Property and/or Equipment Description:

CF - 1 coater

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 P0116373)	Volatile organic compounds (VOC) emissions from coatings and cleanup materials employed in this emissions unit shall not exceed 99 tons per year.
b.	40 CFR Part 60, Subpart RR Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations [§§60.440 – 60.447] According to 60.440, the affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials constructed after December 30, 1980.	The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month. See b)(2)b, d)(2), e)(2) and f)(1)b.
c.	40 CFR Part 63, Subpart JJJJ National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating [§63.3280-3420]	The permittee shall not discharge organic HAP emissions into the atmosphere of more than 4 percent of the mass of coating applied or more than 20 percent of the mass of coating solids applied calculated for each month.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a, c)(1), d)(1), e)(1), f)(1)e and f)(1)f.
d.	OAC rule 3745-21-09(F)(2)(a)	For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer, 0.067 lb VOC/ lb of coating. For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer, 0.08 lb VOC / lb of coating.
e.	OAC rule 3745-21-09(F)(2)(b)	See the work practices in c)(2).

(2) Additional Terms and Conditions

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

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

b. The permittee shall comply with the applicable requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

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

c) Operational Restrictions

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

63.3321(a) and Table 1	What operating limits must be met
63.3370(a)(4) and (5)	How to demonstrate compliance with the emission standard
63.3370(n)(4)	Compliance with uncontrolled coating lines

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

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

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

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

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

c. minimize spills of VOC-containing cleaning materials;

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

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

63.3410	Record keeping

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

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

60.443(a)	Calculating monthly weighted average of mass of solvent per mass of coating solids for non-solvent based coatings (uncontrolled)
60.445(a)	Maintaining monthly record of coating use and VOC content
60.445(h)	Record retention

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

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

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

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

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

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

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

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

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

a. the name and identification number of each coating and cleanup material, as applied;

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

c. the VOC content of each coating (including water and exempt solvents) and cleanup material, in pounds per gallon, as applied;

d. the amount of each coating and cleanup material employed, in gallons; and

e. the total VOC emissions from all coatings and cleanup material, in tons.

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

(5) Each month, the permittee shall sum the monthly VOC emission rates for the calendar year, and shall maintain a year-to-date record of the total VOC emissions from all coatings and cleanup materials for this emissions unit, in tons per year.

(6) The permittee shall maintain a calendar month record of the following information:

a. the name and identification number for each of the coatings used; and

b. the weighted average of the mass of solvent used per mass of coating solids applied, in kg VOC/kg of coating solids, calculated in accordance with the following:

i. the weight fraction of organics and the weight fraction of solids of each coating applied shall be determined by using Reference Method 24 or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data;

ii. the weighted average shall be calculated by using the following equation:

G = (TWMo) / (TWMs)

where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month;

TWMo = the sum, from i = 1 to I = n, of (Woi x Mci);

TWMs = the sum, from i = 1 to i = n, of (Wsi x Mci);

i = subscript denoting an individual coating;

n = the number of different coatings;

Mci = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records;

Woi = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data; and

Wsi = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI P0116373]

(7) The permittee shall collect, record and determine where appropriate the following information each month for this emissions unit:

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

b. the average of the mass of HAP emissions per mass of coating solids applied, in kg HAP/kg coating solids applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP(s) and the weight fraction of coating solids of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311 or 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 5 in section 63.3370(c)(4) of the MACT standard, 40 CFR Part 63, Subpart JJJJ with the following variables:

where:

Hs = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied;

p = Number of different coating materials applied in a month;

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg;

Mi = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Chij = Organic HAP content of material, j, assed to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg;

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.);

Csi = Coating solids content of coating material, i, expressed as a mass-fraction, kg/kg; and

Csij = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass-fraction, kg/kg; and

c. the average of the mass of HAP emissions per mass of coating applied, in kg HAP/kg coating applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP and the weight fraction coating of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311, 40 CFR Part 60, Appendix A, Reference Method 24, or other

test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 4 of Section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ:

where:

HL = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg;

p = Number of different coating materials applied;

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction kg/kg;

Mi = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg; and

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.).

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

e) Reporting Requirements

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

63.3400(a)	General requirement to submit notifications and reports
63.3400(b)	Initial Notification Requirements
63.3400(c)	Semiannual compliance report requirements
63,3400(e)	Notification of Compliance Status requirements

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

(2) The permittee shall submit deviation (excursion) reports that include the following information for this emissions unit:

a. an identification of each month during which the mass-weighted average VOC emissions exceeded 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions, in kg VOC/kg of coating solids, for each such month; and

b. an identification of each month during which the average HAP emission from coatings exceed 20% of the mass of coating solids applied as described in equation 5 for Hs in section 63.3370(c)(4) or 4% of the mass of coatings, applied using equation 4 of HL of section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ.

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

(3) The permittee shall also submit annual reports that identify the VOC emissions from this emissions unit. These reports shall include the calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

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

f) Testing Requirements

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

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

VOC emissions from coatings and cleanup materials employed in this emissions unit shall not exceed 99 tons per year.

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5) of these terms and conditions.

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

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

The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6) of these terms and conditions.

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

c. Emission Limitation:

For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer, 0.067 lb VOC/ lb of coating.

Applicable Compliance Method:

Compliance shall be based on the record keeping required in d)(3) of the terms and conditions of this permit.

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

d. Emission Limitation:

For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer, 0.08 lb VOC / lb of coating.

Applicable Compliance Method:

Compliance shall be based on the record keeping required in d)(3) of the terms and conditions of this permit.

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

e. Emission Limitation:

The permittee shall not discharge organic HAP emissions into the atmosphere of more than 20 percent of the mass of coating solids applied (0.20 kg HAPs/kg coating solids), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(7) of these terms and conditions.

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

f. Emission Limitation:

The permittee shall not discharge organic HAP emissions into the atmosphere of more than 4 percent of the mass of coating applied (0.04 kg HAPs/kg coating), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(7) of these terms and conditions.

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

(2) USEPA Method 24 or GCMS, Capillary Column Technique Method 8260A shall be used to determine the VOC contents of the cleanup materials employed in this emissions unit, unless otherwise approved by Ohio EPA. Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of ready to use and experimental coatings if the amount of a specific formulation of a ready to use or an experimental coating used is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24. The amount of experimental coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

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

g) Miscellaneous Requirements

(1) None.

2. K002, CF-2 Coating Line

Operations, Property and/or Equipment Description:

CF-2 adhesive coater w/ drying oven, wind and unwind station, and 3-corona treaters

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 02-15512)	Volatile organic compounds (VOC) emissions shall not exceed 21.0 pounds per hour from coatings and cleanup materials. Nitrogen oxides (NO_x) emissions shall not exceed 1.5 pounds per hour.
b.	40 CFR Part 60, Subpart RR Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations [§§60.440 – 60.447] According to 60.440, the affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials constructed after December 30, 1980.	The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month. See b)(2)b, d)(2), e)(2) and f)(1)c.
c.	40 CFR Part 63, Subpart JJJJ National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating	The permittee shall not discharge organic HAP emissions into the atmosphere of more than 4 percent of the mass of coating applied or more than 20 percent of the mass of coating solids applied

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[§63.3280-3420]	calculated for each month. See b)(2)c, c)(1), d)(1), e)(1), f)(1)f and f)(1)g.
d.	OAC rule 3745-21-09(F)(2)(a)	For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer, 0.067 lb VOC/ lb of coating. For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer, 0.08 lb VOC / lb of coating.
e.	OAC rule 3745-21-09(F)(2)(b)	See the work practices in c)(3).

(2) Additional Terms and Conditions

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

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

b. The permittee shall comply with the applicable requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

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

c) Operational Restrictions

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

63.3321(a) and Table 1	What operating limits must be met
63.3370(a)(4) and (5)	How to demonstrate compliance with the emission standard

63.3370(n)(4)	Compliance with uncontrolled coating lines

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

(2) The permittee shall use low NO_x burners at all times when this emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-15512]

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

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

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

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

c. minimize spills of VOC-containing cleaning materials;

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

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

63.3410	Record keeping

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

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

60.443(a)	Calculating monthly weighted average of mass of solvent per mass of coating solids for non-solvent based coatings (uncontrolled)
60.445(a)	Maintaining monthly record of coating use and VOC content
60.445(h)	Record retention

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

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

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

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

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

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

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

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

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

a. the name and identification number of each coating and cleanup material, as applied;

b. the VOC content of each coating and cleanup material in pounds per gallon, as applied;

c. the amount of each coating and cleanup material employed, in gallons per day;

d. the total VOC emissions from all coatings and cleanup materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-15512]

(5) The permittee shall maintain a calendar month record of the following information:

a. the name and identification number for each of the coatings used; and

b. the weighted average of the mass of solvent used per mass of coating solids applied, in kg VOC/kg of coating solids, calculated in accordance with the following:

i. the weight fraction of organics and the weight fraction of solids of each coating applied shall be determined by using Reference Method 24 or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data;

ii. the weighted average shall be calculated by using the following equation:

G = (TWMo) / (TWMs)

where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month;

TWMo = the sum, from i = 1 to I = n, of (Woi x Mci);

TWMs = the sum, from i = 1 to i = n, of (Wsi x Mci);

i = subscript denoting an individual coating;

n = the number of different coatings;

Mci = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records;

Woi = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data; and

Wsi = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-03703]

(6) The permittee shall collect, record and determine where appropriate the following information each month for this emissions unit:

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

b. the average of the mass of HAP emissions per mass of coating solids applied, in kg HAP/kg coating solids applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP(s) and the weight fraction of coating solids of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311 or 40 CFR Part 60, Appendix A, Reference

Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 5 in section 63.3370(c)(4) of the MACT standard, 40 CFR Part 63, Subpart JJJJ with the following variables:

where:

Hs = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied;

p = Number of different coating materials applied in a month;

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg;

Mi = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Chij = Organic HAP content of material, j, assed to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg;

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.);

Csi = Coating solids content of coating material, i, expressed as a mass-fraction, kg/kg; and

Csij = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass-fraction, kg/kg; and

c. the average of the mass of HAP emissions per mass of coating applied, in kg HAP/kg coating applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP and the weight fraction coating of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311, 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 4 of Section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ:

where:

HL = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg;

p = Number of different coating materials applied;

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction kg/kg;

Mi = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg; and

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.).

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

e) Reporting Requirements

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

63.3400(a)	General requirement to submit notifications and reports
63.3400(b)	Initial Notification Requirements
63.3400(c)	Semiannual compliance report requirements
63,3400(e)	Notification of Compliance Status requirements

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

(2) The permittee shall submit deviation (excursion) reports that include the following information for this emissions unit:

a. an identification of each day during which the average hourly VOC emissions from this emissions unit exceeded 21.0 pounds per hour, and the actual average hourly VOC emissions from this emissions unit for each such day;

b. an identification of each month during which the mass-weighted average VOC emissions exceeded 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions, in kg VOC/kg of coating solids, for each such month; and

c. an identification of each month during which the average HAP emission from coatings exceed 20% of the mass of coating solids applied as described in equation 5 for Hs in section 63.3370(c)(4) and 4% of the mass of coatings, applied using equation 4 of HL of section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ.

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

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 21.0 pounds per hour from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4) of these terms and conditions.

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

b. Emission Limitation:

NO_x emissions shall not exceed 1.5 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor of 100 pounds of NO_x per million cubic foot of natural gas input, from AP-42, July 1998, section 1.4, Natural Gas Combustion, by the maximum hourly gas burning capacity (11,373 cubic foot) of this emissions unit.

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

c. Emission Limitation:

The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5) of these terms and conditions.

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

d. Emission Limitation:

For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer, 0.067 lb VOC/ lb of coating.

Applicable Compliance Method:

Compliance shall be based on the record keeping required in d)(3) of the terms and conditions of this permit.

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

e. Emission Limitation:

For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer, 0.08 lb VOC / lb of coating.

Applicable Compliance Method:

Compliance shall be based on the record keeping required in d)(3) of the terms and conditions of this permit.

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

f. Emission Limitation:

The permittee shall not discharge organic HAP emissions into the atmosphere of more than 20 percent of the mass of coating solids applied (0.20 kg HAPs/kg coating solids), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6) of these terms and conditions.

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

g. Emission Limitation:

The permittee shall not discharge organic HAP emissions into the atmosphere of more than 4 percent of the mass of coating applied (0.04 kg HAPs/kg of coating), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6) of these terms and conditions.

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

(2) USEPA Method 24 or GCMS, Capillary Column Technique Method 8260A shall be used to determine the VOC contents of the cleanup materials employed in this emissions unit, unless otherwise approved by Ohio EPA. Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of ready to use and experimental coatings if the amount of a specific formulation of a ready to use or an experimental coating used is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24. The amount of experimental coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-15512]

g) Miscellaneous Requirements

(1) None.

3. K003, CF-3 Coating Line

Operations, Property and/or Equipment Description:

CF-3 Coating line including web unwind station, corona treater, roll coating stations, drying oven and web rewind station

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 02-18178)	Volatile organic compounds (VOC) emissions from the coating line shall not exceed 27.6 pounds per hour as a daily average, including cleanup, and 121 tons per year. Nitrogen oxides (NO_x) emissions from the ovens and web treater shall not exceed 1.40 pounds per hour and 6.2 tons per year. See c)(1) below. Carbon monoxide (CO) emissions from the ovens and web treater shall not exceed 1.20 pounds per hour and 5.2 tons per year. See b)(2)a.
b.	40 CFR Part 60, Subpart RR Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations [§§60.440 – 60.447] According to 60.440, the affected facility to which the provisions of this	The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month. See b)(2)c, d)(2), e)(2) and f)(1)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials constructed after December 30, 1980.	
c.	40 CFR Part 63, Subpart JJJJ National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating [§63.3280-3420]	The permittee shall not discharge organic HAP emissions into the atmosphere of more than 4 percent of the mass of coating applied or more than 20 percent of the mass of coating solids applied calculated for each month. See b)(2)b, c)(1), d)(1), e)(1), f)(1)g and f)(1)h.
d.	OAC rule 3745-21-09(F)(2)(a)	For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer, 0.067 lb VOC/ lb of coating. For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer, 0.08 lb VOC / lb of coating.
e.	OAC rule 3745-21-09(F)(2)(b)	See the work practices in c)(3).

(2) Additional Terms and Conditions

a. Silicone and top coat coatings shall not be applied concurrently.

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

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

c. The permittee shall comply with the applicable requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

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

c) Operational Restrictions

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

63.3321(a) and Table 1	What operating limits must be met
63.3370(a)(4) and (5)	How to demonstrate compliance with the emission standard
63.3370(n)(4)	Compliance with uncontrolled coating lines

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

(2) The permittee shall use low NOx burners in the ovens at all times when this emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-18178]

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

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

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

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

c. minimize spills of VOC-containing cleaning materials;

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

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

63.3410	Record keeping

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

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

60.443(a)	Calculating monthly weighted average of mass of solvent per mass of coating solids for non-solvent based coatings (uncontrolled)
60.445(a)	Maintaining monthly record of coating use and VOC content
60.445(h)	Record retention

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

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

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

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

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

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

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

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

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

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

a. the name and identification number of each coating and cleanup material, as applied;

b. the VOC content of each coating and cleanup material in pounds per gallon, as applied;

c. the amount of each coating and cleanup material employed, in gallons per day;

d. the total VOC emissions from all coatings and cleanup materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-18178]

(5) The permittee shall maintain a calendar month record of the following information:

a. the name and identification number for each of the coatings used; and

b. the weighted average of the mass of solvent used per mass of coating solids applied, in kg VOC/kg of coating solids, calculated in accordance with the following:

i. the weight fraction of organics and the weight fraction of solids of each coating applied shall be determined by using Reference Method 24 or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data;

ii. the weighted average shall be calculated by using the following equation:

G = (TWMo) / (TWMs)

where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month;

TWMo = the sum, from i = 1 to I = n, of (Woi x Mci);

TWMs = the sum, from i = 1 to i = n, of (Wsi x Mci);

i = subscript denoting an individual coating;

n = the number of different coatings;

Mci = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records;

Woi = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data and

Wsi = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-03703]

(6) The permittee shall collect, record and determine where appropriate the following information each month for this emissions unit:

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

b. the average of the mass of HAP emissions per mass of coating solids applied, in kg HAP/kg coating solids applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP(s) and the weight fraction of coating solids of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311 or 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 5 in section 63.3370(c)(4) of the MACT standard, 40 CFR Part 63, Subpart JJJJ with the following variables:

where:

Hs = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied;

p = Number of different coating materials applied in a month;

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg;

Mi = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Chij = Organic HAP content of material, j, assed to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg;

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.);

Csi = Coating solids content of coating material, i, expressed as a mass-fraction, kg/kg; and

Csij = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass-fraction, kg/kg; and

c. the average of the mass of HAP emissions per mass of coating applied, in kg HAP/kg coating applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP and the weight fraction coating of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311, 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 4 of Section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ:

where:

HL = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg;

p = Number of different coating materials applied;

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction kg/kg;

Mi = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg; and

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.).

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

e) Reporting Requirements

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

63.3400(a)	General requirement to submit notifications and reports
63.3400(b)	Initial Notification Requirements
63.3400(c)	Semiannual compliance report requirements
63,3400(e)	Notification of Compliance Status requirements

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

(2) The permittee shall submit deviation (excursion) reports that include the following information for this emissions unit:

a. an identification of each day during which the average hourly VOC emissions exceeded 27.6 pounds per hour, and the actual average hourly VOC emissions, for each such day;

b. an identification of any record indicating that the annual VOC emissions exceeded 121 tons per year, and the actual annual VOC emissions;

c. an identification of each month during which the mass-weighted average VOC emissions exceeded 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions, in kg VOC/kg of coating solids, for each such month; and

d. an identification of each month during which the average HAP emission from coatings exceed 20% of the mass of coating solids applied as described in equation 5 for Hs in section 63.3370(c)(4) and 4% of the mass of coatings, applied using equation 4 of HL of section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ.

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

f) Testing Requirements

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

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

VOC emissions from the coating line shall not exceed 27.6 pounds per hour as a daily average, including cleanup, and 121 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4) of these terms and conditions.

The tpy emission limitation was developed by multiplying the short-term allowable VOC emission limitation (27.6 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

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

b. Emission Limitation:

NOx emissions from the ovens and web treater shall not exceed 1.40 pounds per hour and 6.2 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 100 pounds of NOx per million cubic feet of natural gas (EPA AP-42, July 1998, Section 1.4, Natural Gas Combustion) by the maximum hourly natural gas combustion capacity (14,000 ft^3/hr) of this emissions unit. If required, emission testing to determine compliance with the above emission limitation shall be performed, using Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A.

The typ emission limitation was developed by multiplying the short-term allowable NOx emission limitation (1.40 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

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

c. Emission Limitation:

CO emissions from the ovens and web treater shall not exceed 1.20 pounds per hour and 5.2 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 84 pounds of CO per million cubic feet of natural gas (EPA AP-42, July 1998, Section 1.4, Natural Gas Combustion) by the maximum hourly natural gas combustion capacity (14,000 ft^3/hr) of this emissions unit. If required, emission testing to determine compliance with the above emission limitation shall be performed, using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A.

The typ emission limitation was developed by multiplying the short-term allowable CO emission limitation (1.20 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

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

d. Emission Limitation:

The permittee shall not discharge VOC emissions into the atmosphere emissions of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(5) of these terms and conditions.

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

e. Emission Limitation:

For non-solvent based pressure sensitive tape and label surface coatings employed in the adhesive coater and/or primer, 0.067 lb VOC/ lb of coating.

Applicable Compliance Method:

Compliance shall be based on the record keeping required in d)(3) of the terms and conditions of this permit.

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

f. Emission Limitation:

For all other non-solvent based pressure surface coatings employed in the adhesive coater and/or primer, 0.08 lb VOC / lb of coating.

Applicable Compliance Method:

Compliance shall be based on the record keeping required in d)(3) of the terms and conditions of this permit.

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

g. Emission Limitation:

The permittee shall not discharge organic HAP emissions into the atmosphere of more than 20 percent of the mass of coating solids applied (0.20 kg HAPs/kg coating solids), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6) of these terms and conditions.

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

h. Emission Limitation:

The permittee shall not discharge organic HAP emissions into the atmosphere of more than 4 percent of the mass of coating applied (0.04 kg HAPs/kg of coating), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6) of these terms and conditions.

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

(2) USEPA Method 24 or GCMS, Capillary Column Technique Method 8260A shall be used to determine the VOC contents of the cleanup materials employed in this emissions unit, unless otherwise approved by Ohio EPA. Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of ready to use and experimental coatings if the amount of a specific formulation of a ready to use or an experimental coating used is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24. The amount of experimental coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-18178]

g) Miscellaneous Requirements

(1) None.