OhioEPA
State of Ohio Environmental Protection Agency

02

PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance 12/08/93

Application No. 1652050158K001

Effective Date 12/08/93

Permit Fee $100

This document constitutes issuance to:

PACKAGING SPECIALTIES, INC.
300 LAKE ROAD
MEDINA OHIO 44256

of a permit to operate for:

SURFACE COATING LINE-FOUR SPRAY BOOTHS, OVEN
BAKE OVEN & WATER WASH SPRAY BOOTHS.

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until 12/07/96
   You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any 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 and federal air pollution laws and regulations and the terms and conditions of this permit.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with 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 this source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is:
   AIR POLLUTION CONTROL
   177 S. BROADWAY
   AKRON, OH 44308 (216) 375-2480
10. [X] If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R Schregardus

Director

EPA 3834
Revised 9-90

APPLICATION NUMBER: 1652050158 K001

FACILITY NAME: Packaging Specialties, Inc.

EQUIPMENT DESCRIPTION: Surface Coating Line-Four Spray Booths, Oven.

COMPANY ID: Bake Oven and Water Wash Spray Booths.

SPECIAL TERMS AND CONDITIONS

1) The following rules of the Ohio Administrative Code establish the applicable emission limitations and/or control requirements for this source. (This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

OAC 3745-21-09 (U)
OAC 3745-21-09 (B)
OAC 3745-31
PTI #16-897

2) This source shall be equipped with water wash spray booths to control particulate emissions from coating overspray. The water wash collection efficiency shall be sufficient to eliminate visible emissions of particulate matter to ambient air.

3) The volatile organic compound (VOC) content of the coatings employed for steel drums shall not exceed the following:

a) 5.0 pounds of VOC per gallon of coating, excluding water, for the interior coating of a steel drum.

b) 3.5 pounds of VOC per gallon of coating, excluding water, for the exterior coating of a steel drum.

4) Compliance with Condition #3 may be based upon a weighted average by volume of all coating materials employed in any one day. In this case, the permit holder must collect and record the following information each day and maintain the information at the facility for a period of three years:

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

b) The mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied.

c) The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of rule 3745-21-10 of the Ohio Administrative Code for $C_{VOC,2}$

(Continued)

The permit holder shall notify Akron Regional Air Quality Management District of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable emission limitation. A copy of such record shall be sent to Akron Regional Air Quality Management District within forty-five (45) days after the exceedance occurs.

5) The permit holder shall maintain monthly records which list the following information for each surface coating employed in this source:

a) Company identification and type (interior/exterior of the surface coating.
b) Number of gallons employed.
c) VOC content in pounds of VOC per gallon of coating.
d) VOC content in pounds of VOC per gallon of coating, minus water.
e) Water content in percent by volume.
f) Solids content in percent by volume.
g) Density of the volatile organic solvent in pounds per gallon.

The permit holder shall also maintain monthly records on clean-up emissions by identifying any clean-up solvent used, the number of gallons employed, the number of gallons of spent solvent shipped out for disposal or recycling, the VOC content in percent by volume for clean and spent solvents.

These monthly records, as well as any supporting coating analyses or computations, shall be retained in the company files for a period of not less than three years and shall be made available to the Director or his authorized representative for review during normal business hours.

6) The permit holder shall submit annual reports to the Akron Regional Air Quality Management District which summarize monthly coating usage and clean-up information required to be kept under Term and Condition #5. The reports shall be submitted by February 1 of each year and shall cover the previous twelve calendar months (January to December).

PREPARED BY: Frank J. Markunas

DATE PREPARED 11/3/93