



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
MEDINA COUNTY
Application No: 16-02375
Fac ID: 1652050059**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
40 CFR Part 63, subpart JJJJ	MACT
40 CFR Part 60, subpart RR	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 11/23/2004

3M Medina
Dianne deJolsvay
B42-2E-27 PO Box 33331
St. Paul, MN 55133-3331

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

REC'D. ARAQMD
2004 DEC -9 PM 12: 06

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

ARAQMD



Permit To Install
Terms and Conditions

Issue Date: 11/23/2004
Effective Date: 11/23/2004

FINAL PERMIT TO INSTALL 16-02375

Application Number: 16-02375

Facility ID: 1652050059

Permit Fee: **\$200**

Name of Facility: 3M Medina

Person to Contact: Dianne deJolsvay

Address: B42-2E-27 PO Box 33331
St. Paul, MN 55133-3331

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1030 Lake Rd
Medina, Ohio**

Description of proposed emissions unit(s):

Chapter 31 modification which will supercede PTI 16-02229 issued on 6/6/2002 to increase the VOC emission limitations and to remove and add various requirements for emissions unit K003.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and

October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. 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 are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

4. 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.

5. 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.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. 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 permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. 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.

7. 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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, 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:
 - i. 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.
 - ii. 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 ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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 appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the

emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. **Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. **Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	32.6

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. The permittee's existing emissions units are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ and therefore are subject to all the requirements listed for existing sources pursuant to 40 CFR Part 63, Subpart JJJJ. You must limit organic HAP emissions to the level specified in paragraph 1.a, 1.b, 1.c, or 1.d below:
 - a. No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or
 - b. No more than 4 percent of the mass of coating materials applied for each month at existing affected sources; or
 - c. No more than 20 percent of the mass of coating solids applied for each month at existing affected sources; or
 - d. If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.
2. The permittee shall achieve total, on-going compliance with all applicable requirements of 40 CFR Part 63, Subpart JJJJ on or before the mandatory compliance date of December 5, 2005. Also, the permittee shall complete any performance test required in section 63.3360 of 40 CFR Part 63, subpart JJJJ within the time limits specified in section 63.7(a)(2) of 40 CFR Part 63, subpart A.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Coater with drying oven and laminating station - Emulsion Coater Number 2 (the terms and conditions in this permit supercede the terms and conditions in PTI 16-02229 issued 6/6/2002).	OAC rule 3745-31-05(A)(3)	65.0 pounds of organic compounds (OC) per hour for coatings The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F), OAC rule 3745-31-05(C), 40 CFR Part 60, subpart RR, and 40 CFR Part 63, subpart JJJJ.
	OAC rule 3745-31-05(C) (to avoid being a major modification under the nonattainment provisions listed in Chapter 3745-31)	Both the annual combined coating and cleanup material usage OC input rate* and the annual OC emissions shall not exceed 32.6 tons of OC per year as a rolling, 12-month summation (See A.I.2.b below.)
	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents
	40 CFR Part 60, subpart RR	On and after the date on which the performance test required by section 60.8 of 40 CFR Part 60, subpart A has been completed each owner or operator subject to 40 CFR Part 60, subpart RR shall: Cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied

40 CFR Part 63, subpart JJJJ

as calculated on a weighted average basis for one calendar month.

[Authority for term: section 60.442(a)(1) of 40 CFR Part 60, subpart RR]

You must limit organic HAP emissions to the level specified in paragraph a, b, c, or d below:

- a. No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or
- b. No more than 4 percent of the mass of coating materials applied for each month at existing affected sources; or
- c. No more than 20 percent of the mass of coating solids applied for each month at existing affected sources; or
- d. If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

The compliance date for existing affected sources in this subpart is December 5, 2005.

*Annual coating and cleanup material usage is based upon a OC input rate that is equivalent to the annual OC emission rates and is based upon the following: OC

input rate = (C) x (D) where C = the number of gallons of each coating and cleanup material employed and D = the OC content of each coating and clean up material employed in pounds of OC per gallon of coating and clean up material where 100% of the solvents in the coating and clean up materials employed is emitted.

2. Additional Terms and Conditions

- 2.a** The hourly OC emission limitation regulated per OAC rule 3745-31-05(A)(3) is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

- 2.b** Both the annual combined coating and cleanup material usage OC input rate* and the annual emissions of OC from this emissions unit shall not exceed 32.6 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates and OC emissions, respectively. The permittee has existing coating and cleanup material usage OC input* records and therefore does not need to be limited to first year monthly coating and cleanup material usage OC input* amounts.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the line:
- a. the name and identification number of each coating, as applied;

- b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied;
- c. the OC content of each coating, in pounds per gallon, as applied;
- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;
- f. the OC content of each cleanup material, in pounds per gallon;
- g. the number of gallons of each cleanup material employed;
- h. the total coating and clean up material usage OC input amounts* and the total OC emissions from all coatings and cleanup materials employed, in tons per month; and
- i. the rolling, 12-month summation of the total coating and cleanup material usage OC input rate* and the total OC emissions from all coatings and cleanup materials employed, in tons per year.

2. To determine compliance with section 60.442(a)(1) of 40 CFR Part 60, subpart RR the owner or operator of the affected facility shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

- a. Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.
- b. Compute the weighted average by the following equation:

$$G = \frac{[\text{the summation } (W_{oi}) \times (M_{ci}) \text{ from } i=1 \text{ to } n]}{[\text{the summation of } (W_{si}) \times (M_{ci}) \text{ from } i = 1 \text{ to } n]}$$

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

M_{ci} = 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 Method 24 or coating manufacturer's formulation data.

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

For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with section 60.442(a)(1) of 40 CFR Part 60, subpart RR.

[Authority for term: sections 60.441(b) and 60.443(a) of 40 CFR Part 60, subpart RR]

3. After the initial performance test required for all affected facilities under section 60.8 of 40 CFR Part 60, subpart A, compliance with the VOC emission limitation and percentage reduction requirements under section 60.442 of 40 CFR Part 60, subpart RR is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.

[Authority for term: section 60.443(f) of 40 CFR Part 60, subpart RR]

4. The owner or operator of an affected facility subject to 40 CFR Part 60, subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section A.V.1.d of these terms and conditions or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: section 60.445(a) of 40 CFR Part 60, subpart RR]

5. Records of the measurements required in sections A.III.2 through A.III.4 of these terms and conditions must be retained for at least two years following the date of the measurements.

[Authority for term: section 60.445(h) of 40 CFR Part 60, subpart RR]

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of either the rolling, 12-month emission limitation for OC and/or the coating and cleanup material usage OC input rate*.

3. For all affected facilities subject to compliance with section 60.442(a)(1) of 40 CFR Part 60, subpart RR, the performance test data and results from the performance test shall be submitted to the Administrator as specified in section 60.8(a) of the General Provisions (40 CFR part 60, subpart A).

[Authority for term: section 60.447(a) of 40 CFR Part 60, subpart RR]

4. Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Administrator of exceedances of the VOC emission limits specified in section 60.442(a)(1) of 40 CFR Part 60, subpart RR. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

[Authority for term: section 60.447(b) of 40 CFR Part 60, subpart RR]

5. The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

[Authority for term: section 60.447(d) of 40 CFR Part 60, subpart RR]

6. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.I.c of this permit.
7. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

65.0 pounds of OC per hour for coatings

Applicable Compliance Method:

Multiply the maximum pounds of coating applied per hour by the maximum OC weight fraction.

- b. Emission Limitation:

Both the annual combined coating and cleanup material usage OC input rate* and the annual OC emissions shall not exceed 32.6 tons of OC per year as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping as required in section A.III.1 of these terms and conditions.

c. Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

d. Emission Limitation:

0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month

Applicable Compliance Method:

The performance test for affected facilities complying with section 60.442 of 40 CFR Part 60, subpart RR without the use of add-on controls shall be identical to the procedures specified in section A.III.2 of these terms and conditions.

The VOC content per unit of coating solids applied and compliance with section 60.422(a)(1) of 40 CFR Part 60, subpart RR shall be determined by either Method 24 and the equations specified in section A.III.2 of these terms and conditions or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Administrator may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

[Authority for term: sections 60.444(a) and 60.446(a) of 40 CFR Part 60, subpart RR]

e. Emission Limitations:

You must limit organic HAP emissions to the level specified in paragraph a, b, c, or d below:

- i. No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or
- ii. No more than 4 percent of the mass of coating materials applied for each month at existing affected sources; or
- iii. No more than 20 percent of the mass of coating solids applied for each month at existing affected sources; or
- iv. If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Compliance with the emission limitations shall be demonstrated as described in section 63.3370 of 40 CFR Part 63, subpart JJJJ.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install 16-02375 shall supercede all air pollution control requirements for K003 in permit to install 16-02229.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Coater with drying oven and laminating station - Emulsion Coater Number 2 (the terms and conditions in this permit supercede the terms and conditions in PTI 16-02229 issued 6/6/2002).	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

3M Medina

PTI Application: 16-02375

Issued: 11/23/2004

Facility ID: 1652050059

Emissions Unit ID: K003

V. Testing Requirements

None

VI. Miscellaneous Requirements

None