OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Medina County
Application No: 16-1805
NSPS

CERTIFIED MAIL

August 12, 1998

ROTON CORPORATION
RICHARD FOWLER
1030 LAKE ROAD
MEDINA, OH 44256

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 with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
AKRON AIR POLLUTION CONTROL
Michigan Dept of Environmental Quality

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

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State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 16-1805
APS Premise No. 0652050059
Permit Fee: $400.00

Name of Facility: ROTON CORPORATION

Person to Contact: RICHARD FOWLER

Address: 1030 LAKE ROAD
MEDINA, OH 44256

Location of proposed source(s): 1030 LAKE ROAD
MEDINA, OHIO

Description of proposed source(s):
ADHESIVE COATER WITH 3-ZONE OVEN & LAMINATING STATION FOR CO ATING/LAMINATING WATER-BASED PRESSURE SENSITIVE PRODUCTS.

Date of Issuance: August 12, 1998

Effective Date: August 12, 1998

The above named entity is hereby granted a permit to install for the above described source(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 source(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 source(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

Donald R Schregardus

Director

Facility Name: **Roton Corporation**
Application Number: **16-1805**
Date: **August 12, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

Facility Name: **Roton Corporation**
Application Number: **16-1805**
Date: **August 12, 1998**

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

Facility Name: **Roton Corporation**
Application Number: **16-1805**
Date: **August 12, 1998**

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Roton Corporation** located in **Medina** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
K004	Water-based coating station with 3-zone drying oven for coating and laminating pressure sensitive adhesive products. E3-Emulsion Coater	The use of only water-based emulsion adhesive coatings which comply with the 0.2 Kg VOC/Kg solids limit specified in this permit of non-photochemically reactive clean up solvents.	3745-31-05	35.9 tons organic compounds per year.
			3745-21-09(F)	2.9 lbs VOC/gal excluding water and exempted solvents *
			40 CFR 60 Subpart RR	0.20 Kg VOC/Kg of coating solids applied on average basis for one calendar month. 1.0 tons/year Ethyl Acetate from clean up.

* Based upon proposed coatings, this would be less stringent than BAT and 40 CFR 60 Subpart RR.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Ethyl Acetate	1.0
OC	35.9

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

Source Number	Source Description	NSPS Regulation (Subpart)
K004	Coating of pressure sensitive adhesive products on paper, vinyls and foils.	RR

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

a. construction date (no later than 30 days after such date);
b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
c. actual start-up date (within 15 days after such date); and
d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Akron Regional Air Quality**
146 South High Street, Room 904
Akron, Ohio 44308

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Akron Regional Air Quality, 146 South High Street, Room 904, Akron, Ohio 44308.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Regional Air Quality, 146 South High Street, Room 904, Akron, Ohio 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

Facility Name: **Roton Corporation**
Application Number: **16-1805**
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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

1. The permittee shall not cause the discharge into the atmosphere from this emissions unit more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month.

B. Recordkeeping and Monitoring

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), as applied; and,

   c. monthly records of all coatings employed, and the results of the reference test method specified in § 60.446(a) of 40 CFR 60 Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

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

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

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

   d. the number of gallons (excluding water and exempt solvents) of each coating employed; and,

e. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. an identification of each month during which the average organic compound emissions from the coatings exceeded 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month, and the actual average monthly organic compound emissions for each such month;

   b. an identification of each month during which photochemically reactive cleanup materials were employed, and the actual controlled organic compound emissions for each such day; and,

   c. the permittee shall notify the Director Akron Air Pollution Control 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 Akron Air Pollution Control within 30 days following the end of the calendar month.

2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

D. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following method(s):

Emission Limitation: 0.20 kg VOC/kg of coating solids applied.

Applicable Compliance Method:

The VOC content per kilogram of coating solids applied, and compliance with § 60.422(a)(1)of 40 CFR 60 Subpart RR shall be determined by either Reference Method 24 and the equations specified in § 60.443 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 Reference 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.

Emission Limitation: 2.9 pounds VOC per gallon of coating employed.

Applicable Compliance Method:

USEPA Methods 24 and 24A or the manufacturer's formulation data shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation: 35.9 tons organic compounds per year.

Applicable Compliance Method:

Monthly records shall be maintained of the organic compound content of each coating and cleanup material employed, the monthly usage of each coating and cleanup material employed and the monthly and annual organic compound emission rate for all coatings and cleanup materials employed. Formulation data or USEPA Method 24 shall be used to determine the organic compound content of each cleanup material.

Emission Limitation: 1.0 ton per year Ethyl Acetate(cleanup material)

Applicable Compliance Method:

Daily records shall be maintained that record the usage of all cleanup solvents employed in the individual coating lines. Formulation data shall be used to determine the hazardous air pollutant content of each solvent employed.