



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

RE: FINAL PERMIT TO INSTALL MODIFICATION

MEDINA COUNTY

Application No: 16-02263

Fac ID: 1652050059

DATE: 1/29/2008

3M Medina
J Michael Osborne
B42-2E-27 PO Box 33331
St. Paul, MN 55133-3331

	TOXIC REVIEW
	PSD
	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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

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

CC: USEPA

ARAQMD

REC'D. ARAQMD
2008 FEB -5 PM 2:20

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 16-02263

Application Number: 16-02263

Facility ID: 1652050059

Permit Fee: **\$200**

Name of Facility: 3M Medina

Person to Contact: J Michael Osborne

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**

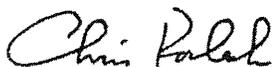
Description of proposed emissions unit(s):

Administrative modification to PTI 16-02263 issued final on June 1, 2006 to decrease the overall control efficiency and increase the hourly allowable emission limitation for VOC.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
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 (i.e., postmarked) quarterly, 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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 re-issuance, or modification
- 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, 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 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 (i.e., postmarked) 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.)

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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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., postmarked), 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>
PM	0.4
VOC*	116.57
NO _x	57.8
CO	36.2

* Note: All VOC emissions are considered to be organic HAP emissions.

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. Emissions units K001, K002, K003, K004 and K005 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 affected sources, as defined in 40 CFR 63.3310, pursuant to 40 CFR Part 63, Subpart JJJJ, which is included in the text of Attachment 1 hereto, and is hereby incorporated into this permit as if fully rewritten.
2. The permittee shall have achieved total, ongoing 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.
3. Given the applicability of 40 CFR Part 63, Subpart JJJJ, the permittee shall also comply with applicable provisions of 40 CFR Part 63, Subpart A as referenced in Table 2 of 40 CFR Part 63, Subpart JJJJ (see Attachment 1).

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.

Operations, Property, and/or Equipment - (K005) - (Solvent Coater) pressure sensitive tape and label adhesives applied to continuous web paper and film substrates, dried with rated 9.0 MM Btu/hr, natural gas-fired direct heat transfer oven (Modified).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>51.4 lbs/hr & 112.57 tons per year (tpy) of volatile organic compounds (VOC) emissions (thermal oxidizer stack emissions);</p> <p>96% overall VOC emission reduction, by weight;</p> <p>Note: All VOC emissions are considered to be organic HAP emissions.</p> <p>0.1 lb/hr & 0.4 tpy of particulate emissions (PE) (thermal oxidizer stack emissions);</p> <p>13.2 lbs/hr & 57.8 tpy of nitrogen oxides (NO_x) emissions (thermal oxidizer stack emissions);</p> <p>8.26 lbs/hr & 36.2 tpy of carbon monoxide (CO) emissions (thermal oxidizer stack emissions); and</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart JJJJ.</p>
40 CFR Part 63, subpart JJJJ (Paper and Other Web Coating MACT)	See Part II, sections A.1 through A.3 and Attachment 1.
OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR Part 60, subpart RR	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The hourly VOC, PM, NO_x, and CO emission limitations were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these limitations.

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 increase(s) 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 The permittee shall properly install, adjust, operate, and maintain, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), a thermal oxidizer and associated control equipment as necessary to adequately capture, contain, vent, and destroy air emissions of VOCs and HAPs from this emissions unit as required by this permit and to the extent possible with good engineering design and practice.

II. Operational Restrictions

1. The thermal oxidizer with all associated control equipment serving this emissions unit shall be in operation at all times the emissions unit is in operation and coating raw materials. If the thermal oxidizer or any of its associated control equipment malfunctions or must be shut down for any reason, the emissions unit shall immediately cease coating until effective repairs are made. Once coating has ceased, the line may continue operating until the coated material is through the oven. Normal operation does not include oven startup before coating begins.
2. The emissions unit, vented to the thermal oxidizer as required in normal operation, shall only vent directly to ambient air (e.g., through a bypass stack) during emergency conditions as detected by Lower Explosive Level (LEL) instrumentation and the direct venting to ambient air shall only occur until the emissions unit safely ceases coating raw material. The emissions unit shall remain shut down until the reason for the LEL emergency condition has been effectively identified and corrected and the emissions unit can resume normal operations, venting to the thermal oxidizer.
3. The permittee shall store all waste materials in closed containers with tightly fitted covers.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall document all times the thermal oxidizer and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.

2. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, must not fall below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63 subpart JJJJ.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, subpart JJJJ.
4. Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;

- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- 5. The permittee shall collect and record each month the following information for the purpose of determining annual VOC emissions:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total uncontrolled VOC emissions from all the coatings and cleanup materials employed [summation of (b x c) for all coatings+ summation of (e x f) for all cleanup materials], in pounds or tons; and
 - h. the calculated, controlled VOC emission rate for all the coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, subpart JJJJ;
 - c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;

- d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- 2. The permittee shall submit deviation (excursion) reports that identify any time periods when the thermal oxidizer and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation. Each report shall be submitted within 30 days after the deviation occurs.
- 3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.
- 4. This emissions unit is 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.

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 - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, Ohio 44308

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after achieving maximum production at which the emissions unit will be operated, but not later than 180 days after initial start-up of the emissions unit and at such other times as may be required by the Administrator under section 114 of the Clean Air Act.
 - b. The emission testing shall be conducted to demonstrate compliance with the 96% overall VOC emission reduction requirement.

[Note: Compliance with the 95% overall HAP emission reduction requirement is assumed if the permittee demonstrates compliance with the 96% overall VOC emission reduction requirement.]

- c. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron Regional Air Quality Management District.
- d. The following test methods shall be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC:
 - i. The capture efficiency shall be determined using Methods 204 through Method 204F, as specified 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request for the use of an alternative method, including an evaluation of the applicability, necessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)
 - ii. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Administrator.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Regional Air Quality Management District. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron Regional Air Quality Management District's refusal to accept the results of the emission test(s).
 - f. Personnel from the Akron Regional Air Quality Management District shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron Regional Air Quality Management District within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the from the Akron Regional Air Quality Management District.
2. 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 Limitations:

0.1 lb/hr & 0.4 tpy of PE (thermal oxidizer stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).
 - b. Emission Limitations:

51.4 lbs/hr & 112.57 tpy of VOC emissions (thermal oxidizer stack emissions)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in

accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

c. Emission Limitation:

96% overall VOC emission reduction, by weight

Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC emission reduction requirement of 96%, by weight, based on the results of emission testing conducted in accordance with the methods as outlined in Section A.V.1 of this permit.

d. Emission Limitations:

13.2 lbs/hr & 57.8 tpy of NO_x emissions (thermal oxidizer stack emissions).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation based on the results of emission testing conducted in accordance with Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

e. Emission Limitations:

8.26 lbs/hr & 36.2 tpy of CO emissions (thermal oxidizer stack emissions).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation based on the results of emission testing conducted in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

f. Emission Limitations:

The organic HAP emissions shall be limited to the levels specified in paragraph i, ii, iii, or iv 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

None

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.

Operations, Property, and/or Equipment - (K005) - (Solvent Coater) pressure sensitive tape and label adhesives applied to continuous web paper and film substrates, dried with rated 9.0 MM Btu/hr, natural gas-fired direct heat transfer oven (Modified).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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

V. Testing Requirements

None

VI. Miscellaneous Requirements

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.

Operations, Property, and/or Equipment - (L001) - (Die Cleaning Station) cold solvent cleaning of metal coating die.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	4 ton per year of volatile organic compounds (VOC) emissions. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O).
OAC rule 3745-21-09(O)	See A.I.2.a through A.I.2.d below.

2. Additional Terms and Conditions

- 2.a The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
- 2.b The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.
- 2.c The cold cleaner shall be maintained with a freeboard ratio equal to or greater than 0.7.
- 2.d The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - i. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - ii. Store waste solvent in covered containers.

- iii. Close the cover whenever parts are not being handled in the cleaner.
- iv. Drain the cleaned parts until dripping ceases.
- v. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
- vi. Clean only materials that are neither porous nor absorbent.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain records for at least five years of the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit, and make these records available to the Director upon verbal or written request.
- 2. The permittee shall maintain records of the following information, collected at the end of each year:
 - a. the total cleaning solvent added to the cold cleaner or the amount purchased for use in the emissions unit during the year;
 - b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and
 - c. the estimated annual VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year.

IV. Reporting Requirements

- 1. The permittee shall submit annual reports which specify the total VOC 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:

3M Medina

PTI Application: 16-02263

Modification Issued: 1/29/2008

Facility ID: 165205005

Emissions Unit ID: L001

a. Emission Limitation:

4 ton per year of VOC emissions

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the record keeping requirements in section A.III.2 of these terms and conditions.

VI. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment -(L001) - (Die Cleaning Station) cold solvent cleaning of metal coating die.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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

V. Testing Requirements

None

VI. Miscellaneous Requirements

None