

Facility ID: 0829060557 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0829060557 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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> |
|---|--|---|
| Adhesive Paper Coating Process | OAC rule 3745-31-05 (A)(3) PTI # 08-04072 | 55.44 lbs VOC/day, excluding cleanup; 10.14 TPY VOC, including cleanup |
| | OAC rule 3745-21-09 (F) | 0.11 lb VOC/gal ctg, excluding water and exempt solvents Less stringent than the VOC content limitation above. |

2. Additional Terms and Conditions

- (a) The permittee operates a flexographic printer at the head of the paper coating line operation which is subject to OAC rule 3745-21-09 (Y) and the best available technology provisions of OAC rule 3745-31-05 (A)(3). The inks employed in this printer have a VOC content of 0.002 lb/lb ink, or 0.2 % by weight. The projected maximum annual VOC emissions associated with the flexographic printing have been determined to be 166 lbs (0.083 TPY). This satisfies the BAT requirement. Due to the trivial nature of this printing VOC record keeping and reporting requirements have been determined to not be necessary.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The coating material employed in this emissions unit consists of four individual components that are mixed on-site. The four individual components are identified as resin, carbowax, kaolin, and water. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating component;
 - b. the number of gallons of each of the four components, resin, carbowax, kaolin, and water;
 - c. the total number of gallons mixed, for the combined material;
 - d. the total number of gallons mixed, for the combined material, excluding water and exempt solvents;
 - e. the VOC content, in pounds per gallon, for the combined material, excluding water and exempt solvents;
 - f. the name and identification of each cleanup material applied;
 - g. the number of gallons of each cleanup material applied;
 - h. the VOC content of each cleanup material, in pounds per gallon; and,
 - i. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, i.e., (d) X (e) for the combined material added to the sum of the products of (g) X (h) for each cleanup material.
2. The permit to install for this emissions unit (XXXX1) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data

from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

STEL (ug/m3): 370

Maximum Hourly Emission Rate (lbs/hr): 0.61

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5.21

MAGLC (ug/m3): 6.49

Pollutant: methanol

TLV (ug/m3): 262,000

Maximum Hourly Emission Rate (lbs/hr): 1.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8.73

MAGLC (ug/m3): 2,620

Pollutant: diethanolamine

TLV (ug/m3): 2000

Maximum Hourly Emission Rate (lbs/hr): 0.0046

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.039

MAGLC (ug/m3): 20

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. 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 also submit annual reports which specify the total number of gallons of coating mixed, the total number of gallons of cleanup materials, and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- E. Testing Requirements**
1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation -
55.44 lbs VOC/day, excluding cleanup materials

Applicable Compliance Method -

Compliance shall be determined through a summation of each coating's maximum hourly usage, 8.69 gallons resin and 10.38 gallons carbowax, excluding water and exempt solvents (15.24 gallons resin and 10.44 gallons carbowax with water), multiplied by each coating's corresponding maximum VOC content, excluding water and exempt solvents, 0.233 lbs/gal and 0.027 lbs/gal and the maximum operating hours per day, 24 hours. (The combined material also includes 2.37 gallons of kaolin and 1.98 gallons of water which do not contain any volatile organic compounds).

Emission Limitation -

10.14 TPY VOC, including cleanup materials

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in Section C.1. and shall be the summation of the 365 daily VOC emission rates for the calendar year.

Emission Limitation -

0.11 lb VOC/gal ctg, excluding water + exempt solvents

Applicable Compliance Method -

USEPA Method 24 shall be used to determine the VOC contents for 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.

F. **Miscellaneous Requirements**

1. The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted emission unit are subject to public disclosure in accordance with OAC 3745-49-03.
2. The permittee 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 source(s).