

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: **13-04721**

A. Source Description

All Foils has an emissions unit that can be used as a rotogravure or flexographic printing line to apply coatings and inks to metal and plastic substrates. This unit is currently installed at All Foils facility in Brooklyn Heights. The company plans on moving the unit to this facility.

B. Facility Emissions and Attainment Status

This unit's potential to emit for VOC and HAP is greater than threshold limits. The company's actual usage is lower.

PTE was calculated using the maximum coating/ink usage (15 gal/hr) the company's actual emissions were calculated using actual annual usage from the previous year. The company uses two types (group 1 and group 2) of coatings and inks. The HAP and VOC contents vary from 0.1 lb/gal to 10.3 lbs/gal. PTE was calculated using the worst case lb/gal for both HAP and VOC.

They have requested a synthetic minor to avoid Title V, MACT, and Non-attainment NSR.

C. Source Emissions

This emissions unit is the only one located at the facility.

D. Conclusion

The company should have no problem maintaining emissions below the synthetic minor limitations.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

Application No: 13-04721

Fac ID: 1318558632

DATE: 8/16/2007

All Foils, Incorporated
Mike Fienberg
16100 Imperial Parkway
Strongsville, OH 44149-0600

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

CLAA

PA

CUYAHOGA COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04721** FOR AN AIR CONTAMINANT SOURCE
FOR **All Foils, Incorporated**

On 8/16/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **All Foils, Incorporated**, located at **16100 Imperial Parkway, Strongsville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04721:

Rotogravure/flexographic printing line applying coatings and inks to metal and plastic substrates -- K001.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04721

Application Number: 13-04721
Facility ID: 1318558632
Permit Fee: **To be entered upon final issuance**
Name of Facility: All Foils, Incorporated
Person to Contact: Mike Fienberg
Address: 16100 Imperial Parkway
Strongsville, OH 44149-0600

Location of proposed air contaminant source(s) [emissions unit(s)]:

**16100 Imperial Parkway
Strongsville, Ohio**

Description of proposed emissions unit(s):

Rotogravure/flexographic printing line applying coatings and inks to metal and plastic substrates -- K001.

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

Chris Korleski
Director

A. 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 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

All Foils, Incorporated
PTI Application: 13-04721

Facility ID: 1318558632

Issued: To be entered upon final issuance

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

9. 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

All Foils, Incorporated

Facility ID: 1318558632

PTI Application: 13-04721

Issued: To be entered upon final issuance

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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

All Foils, Incorporated**Facility ID: 1318558632****PTI Application: 13-04721****Issued: To be entered upon final issuance**

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements 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, 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 emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

15. 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.

B. 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>
VOC	94.9
Single HAP	9.9
Combined HAPs	24.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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 - (K001) - Genick rotogravure/flexographic printing line for metal and plastic substrates

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	154.5 lbs/hr of volatile organic compounds (VOC) for group 1 coatings 97.5 lbs VOC/hr for group 2 coatings See Section A.2.a below. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(C). Toluene emissions shall not exceed 7.5 lbs/hr, as a monthly average.
OAC rule 3745-21-09(Y)	Exempt; see Section A.2.b below.
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V, MACT Subpart(s) KK and JJJJ and Non-attainment New Source Review	*25.8 tons VOC/rolling 12-months Group 1 coatings; *58.5 tons VOC/rolling 12-months for Group 2 coatings; *10.6 tons VOC/rolling 12-months for cleanup; and *9.9 tons for any single HAP and 24.9 tons total combined HAPs per rolling 12-month period. *Each limit above is based on a rolling, 12-month summation of material usage rates. See Section B.1, B.2 and B.3.

2. Additional Terms and Conditions

- 2.a The pound per hour (lb/hr) emission limits were established at potential to emit (PTE); therefore, monitoring, record keeping and reporting are not required to

Emissions Unit ID: **K001**

determine compliance with these limits.

- 2.b** The requirements of OAC rule 3745-21-09(Y) do not apply to any printing line which is located at a facility in which the total maximum usage of VOC in all coatings and inks employed in all flexographic, packaging rotogravure and publication rotogravure printing lines within the facility is less than or equal to 100 tpy. This emissions unit (K001) is limited to 94.9 tpy VOC and is the only printing line at this facility; therefore, OAC 3745-21-09(Y) does not apply to this emissions unit .

B. Operational Restrictions

- Group 1 coatings - this group includes coatings that have a VOC content over 6.5 lbs VOC/gal up to but not exceeding 10.3 lbs VOC/gal as applied. The maximum annual usage rate in this emissions unit shall not exceed 5,000 gals/yr, based upon a rolling 12 - month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	1400
1-2	1500
1-3	1600
1-4	1700
1-5	2100
1-6	2520
1-7	2940
1-8	3360
1-9	3780
1-10	4200
1-11	4620
1-12	5000

After the first 12 calendar months of operation following the issuance of this permit, compliance with annual coating usage rate limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

- Group 2 coatings - this group includes coatings that have a VOC content up to but not

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

exceeding 6.5 lbs VOC/gal, as applied. The maximum annual usage rate in this emissions unit shall not exceed 18,000 gals/yr, based upon a rolling 12 - month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

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<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	4500
1-2	5000
1-3	5500
1-4	6000
1-5	7500
1-6	9000
1-7	10500
1-8	12000
1-9	13500
1-10	15000
1-11	16500
1-12	18000

After the first 12 calendar months of operation following the issuance of this permit, compliance with annual coating usage rate limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

3. Cleanup material - the maximum annual usage rate in this emissions unit, shall not exceed 3,120 gals/yr, based upon a rolling 12-month summation of the cleanup usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup usage levels specified in the following table.

<u>Month</u>	<u>Maximum Allowable Cumulative cleanup Usage</u>
1	780
1-2	880
1-3	980
1-4	1040
1-5	1300
1-6	1560
1-7	1820
1-8	2080
1-9	2340
1-10	2600
1-11	2860
1-12	3120

All Foils, Incorporated**DTI Application: 13-04724****Facility ID: 1318558632****Emissions Unit ID: K001**

After the first 12 calendar months of operation following the issuance of this permit, compliance with annual cleanup usage rate limitation shall be based upon a rolling, 12-month summation of the cleanup usage rates.

Issued: To be entered upon final issuance**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for the printing line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the volume, in gallons, of each coating in group 1 employed;
 - c. the volume, in gallons, of each coating in group 2 employed;
 - d. the volume, in gallons, of clean-up material employed;
 - e. the VOC content of each coating and cleanup material, in pounds per gallon (lbs/gal), as applied;
 - f. the single HAP content of each coating and cleanup material (lbs/gal), as applied;
 - g. the combined HAP content of each coating and cleanup material (lbs/gal), as applied;
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds $(b*e) + (c*e) + (d*e)$;
 - i. the total single HAP emissions from all coatings and cleanup materials employed, in pounds $(b*f) + (c*f) + (d*f)$;
 - j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds $(b*g) + (c*g) + (d*g)$; and
 - k. for toluene, average pound per hour usage, $(\text{lbs toluene used})/(\text{operating hours})$.
2. The permittee shall maintain monthly records of the following information:
 - a. The coating usage rate for Group 1, Group 2 and cleanup usage rate for each month in gallons; and,
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage rates for

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Group 1, Group 2 and the cleanup usage rates in gallons.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate for Group 1, Group 2 and the cleanup usage rate for each calendar month.

3. The permittee shall collect and record the total VOC, single HAP, and combined HAP emissions from all coatings and cleanup materials employed, in tons, calculated from the monthly records in section C.1 above, for this emissions unit for the purpose of determining annual VOC, single HAP, and combined HAP emissions based on a rolling, 12-month summation of emissions.
4. The permit to install for this/these emissions unit(s) K001 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to

Emissions Unit ID: **K001**

convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):
- $$\text{TLV OVER } 10 \sim \text{TIMES } \left\{ \frac{8 \text{ OVER } X}{4} \right\} \sim \text{TIMES } \left\{ \frac{5 \text{ OVER } Y}{4} \right\} \sim \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 7.5 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1061

MAGLC (ug/m³): 4485.83 μg/m³

Pollutant: Xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 33.70 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4769

MAGLC (ug/m³): 10338 μg/m³

Pollutant: Ethyl Benzene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 9.79 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1385

MAGLC (ug/m³): 10338 μg/m³

The permittee, has demonstrated that emissions of Toluene, Xylene, and Ethyl Benzene from emissions unit(s) K001 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

5. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the

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predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous permitted level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

6. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in

Emissions Unit ID: **K001**

accordance with ORC 3704.03(F);

- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
7. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month usage rate limitations in Section B.1, B.2, and B.3 and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage limits. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports that identify each month during which the average hourly emissions of toluene exceeded the 7.5 lbs/hr toluene emission limit. The notification shall include a copy of such record and shall be sent to the CDAQ within 45 days after the exceedance occurs.
3. The permittee shall notify CDAQ in writing if the calculated yearly VOC emission rate from K001 due to coating usage exceeds the allowable yearly emissions limitation of 25.8 tons VOC/rolling 12-months for Group 1 and/or 58.5 tons VOC/rolling 12-months for Group 2. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
4. The permittee shall notify CDAQ in writing if the calculated yearly VOC clean up material emission rate from K001 exceeds the allowable yearly emissions limitation of 10.6 tons VOC/rolling 12-months. The notification shall include a copy of such record

Issued: To be entered upon final issuance

and shall be sent to CDAQ within 45 days after the exceedance occurs.

5. The permittee shall notify the CDAQ in writing if the calculated yearly single or combined HAPs emission rate from K001 exceeds the allowable yearly emissions limitation of 9.9 tons/rolling 12-months and 24.9 tons/rolling 12-months respectively. The notification shall include a copy of such record and shall be sent to CDAQ within 45 days after the exceedance occurs.
6. The permittee shall submit annual reports to the CDAQ documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Unit ID: K001

a. **Emission Limitation**

154.5 lbs VOC/hour for Group 1 coatings

Applicable Compliance Method

The pound per hour limit is the maximum PTE for this emissions unit determined from the worst case coating as follows:

$$(15 \text{ gals/hr})(10.3 \text{ lbs VOC/gal}) = 154.5 \text{ lbs VOC/hr.}$$

If required, compliance shall be determined by performing a stack test using USEPA test method 25 or 25A as appropriate based on the VOC concentration in the stack.

b. **Emission Limitation**

97.5 lbs VOC/hour for Group 2 coatings

Applicable Compliance Method

The pound per hour limit is the maximum PTE for this emissions unit determined from the worst case coating as follows:

$$(15 \text{ gals/hr})(6.5 \text{ lbs VOC/gal}) = 97.5 \text{ lbs VOC/hr.}$$

If required, compliance shall be determined by performing a stack test using USEPA test method 25 or 25A as appropriate based on the VOC concentration in the stack.

c. **Emission Limitation**

Toluene emissions shall not exceed 7.5 lbs/hr, as a monthly average.

Applicable Compliance Method

Compliance shall be determined by the monitoring and record keeping requirements specified in section C.1.

d. **Emission Limitation**

*25.8 tons VOC/rolling 12-months from Group 1 Coatings

*58.5 tons VOC/rolling 12-months from Group 2 Coatings

*10.6 tons VOC/rolling 12-months from cleanup material

*Based on rolling 12-month summations of material usage.

Applicable Compliance Method

Compliance shall be determined by the monitoring and record keeping requirements specified in sections C.1, C.2, and C.3.

Issued: To be entered upon final issuance

- e. **Emission Limitation**
9.9 tons/rolling 12-months for any single HAP (coatings and cleanup) based on rolling, 12-month summation of material usage.

Issued: To be entered upon final issuance

Applicable Compliance Method

Compliance shall be determined by the monitoring and record keeping requirements specified in section C.

f.

Emission Limitation

24.9 tons/rolling 12-months for total combined HAPs (coatings and cleanup) based on rolling, 12-month summation of material usage.

Applicable Compliance Method

Compliance shall be determined by the by the monitoring and record keeping requirements specified in section C.

F. Miscellaneous Requirements

None