Facility ID: 0855140350 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: 0855140350 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

Go to the top of this document

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - water based adhesive paper coating line with drying oven	OAC rule 3745-31-05 (A)(3) PTI 08-04643	The volatile organic compounds (VOC) emissions shall not exceed 8 lbs/hr, excluding cleanup and 9.73 TPY VOC, including cleanup. The volatile organic compounds content of coatings shall not exceed 0.10 lb-VOC/gallon coating, minus water and exempt solvents
	OAC rule 3745-21-09 (F)	The coating VOC content limit specified by this rule is less stringent than the coating VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

   (a) The 8 lbs VOC/hr limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for the line:

   a. The name and identification number of each coating, as applied;

   b. The VOC content of each coating (excluding water and exempt solvents) as applied;

   c. The number of gallons (excluding water and exempt solvents) of each coating employed;

   d. The name and identification of each cleanup material employed;

   e. The VOC content of each cleanup material employed, in pounds per gallon;

   f. The number of gallons of each cleanup material employed; and

   g. The total VOC emissions from all coatings and cleanup materials employed, in pounds and tons per month.

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 VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

E. **Testing Requirements**

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

   a. Emission Limitation -
   0.10 lb VOC/gallon coating, minus water and exempt solvents

   Applicable Compliance Method -
   Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1 of this permit. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents for the coating materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A 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 24A.

   b. Emission Limitation -
   8 lbs VOC/hr

   Applicable Compliance Method -
   Compliance shall be determined by multiplying the maximum hourly coating usage rate for the emissions unit times the maximum VOC content of the coatings employed in this emissions unit.

   c. Emission Limitation -
   9.73 TPY VOC including cleanup

   Applicable Compliance Method -
   Compliance shall be based upon record keeping as specified in C.1 and shall be the sum of the 12 monthly VOC emission rates, in tons, for the calendar year.

F. **Miscellaneous Requirements**

1. None