



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05635

Fac ID: 1431053380

DATE: 3/1/2005

Da Lite Screen Company Inc
Charlie Vaughn
11500 Williamson Road
Blue Ash, OH 45241

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 3/1/2005
Effective Date: 3/1/2005**

FINAL PERMIT TO INSTALL 14-05635

Application Number: 14-05635
Facility ID: 1431053380
Permit Fee: **\$800**
Name of Facility: Da Lite Screen Company Inc
Person to Contact: Charlie Vaughn
Address: 11500 Williamson Road
Blue Ash, OH 45241

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

**11500 Williamson Road
Blue Ash Ohio, Ohio**

Description of proposed emissions unit(s):

Permitting for one new and three existing flexographic machines with thermal oxidizer for the production of flexible films.

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

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 quarterly, i.e., 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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 this Permit To Install.

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 of 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, the State, and citizens 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 To Install 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.

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B. State Only Enforceable 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 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 quarterly, i.e., 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. 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.

5. 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 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.

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

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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., 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>
OC	4.56

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

- I. Part II of this permit to install lists the requirements for an existing affected source subject to 40 CFR 63 Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

This facility is presently classified as a major source of hazardous air pollutants (HAP). A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

[40 CFR §63.4481(b)]

Flex machines 2, 3, 4 and 5 (P001, P003, P004 and P005 respectively) are surface coating operations as defined in 63.4581 and outlined in 63.4481(a)(1) of 40 CFR 63 Subpart PPPP and are classified in the general use subcategory defined in 63.4481(a)(2).

Flex Machines 2, 3, 4 and 5 (P001, P003, P004 and P005 respectively) are part of an existing affected source, which includes all coating operations as defined in 63.4581 and other items listed in 63.4482(b).

II. Applicable Emissions Limitations and/or Control Requirements

1. The "affected source" subject to the requirements of 40 CFR 63 Subpart PPPP includes the flex machines 2, 3, 4 and 5 (P001, P003, P004, and P005 respectively) and the collection of all of the items listed below:
- All coating operations as defined in 63.4581;
 - All storage containers and mixing vessels in which coatings, thinners and/ or other additives, and cleaning materials are stored or mixed;
 - All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

[40 CFR §63.4482]

2. For emissions units P001, P002, P004 and P005, the permittee shall comply with the requirements

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of 40 CFR 63 Subpart PPPP no later than April 19, 2007.

[40 CFR §63.4483(b)]

3. The requirements of 40 CFR 63 Subpart PPPP listed in Part II of this permit to install shall not apply in the event that the permittee is classified an area source of hazardous air pollutants as defined in 63.2 on or before the compliance date of April 19, 2007 as outlined in the "Summary of the Final Rule" dated April 19, 2004.
4. The permittee shall limit the organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12- month compliance period.

[40 CFR §63.4490(b)(1)]

5. The permittee must include all coatings (as defined in §63.4581), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR §63.4490.

The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The permittee is proposing to comply with the requirements of 40 CFR 63 Subpart PPPP using emission rate without add-on control option and the applicable requirements of 40 CFR 63 Subpart PPPP have been included in the permit.

The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by §63.4530(c), and the permittee must report it in the next semiannual compliance report required in §63.4520. If the permittee employs a different control option than the option listed above, the permittee shall comply with the applicable requirements of that control option, in lieu of complying with the applicable 40 CFR 63 Subpart PPPP requirements listed in this permit.

The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in term A.II.4, calculated as a rolling 12-month emission rate and determined on a monthly basis.

[40 CFR §63.4491(b)]

6. The coating operation(s) must be in compliance with the applicable emission limit at all times.
[40 CFR §63.4500(a)(1)]
7. The permittee must always operate and maintain the affected source, including all air pollution control and monitoring equipment used for purposes of complying with this subpart, according to the provisions in §63.6(e)(1)(i).
[40 CFR §63.4500(b)]
8. The permittee must complete the initial compliance demonstration for the initial compliance period according to the requirements of term A.IV.3 The initial compliance period begins on April 19, 2007 and ends on April 30, 2008. The permittee must determine the mass of organic HAP emissions and mass of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to term A.IV.3 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in term A.II.4.
[40 CFR §63.4550]

III. Operational Restrictions

1. For any coating operation(s) on which the permittee uses the emission rate without add on controls option, the permittee is not required to meet any operating limits.
[40 CFR §63.4492(a)]
2. For any coating operation(s) on which the permittee uses the emission rate without add-on controls option, the permittee is not required to meet any work practice standards.
[40 CFR §63.4493(a)]

IV. Monitoring and/or Recordkeeping Requirements

1. The permittee must collect and keep records of the data and information specified below. Failure to collect and keep these records is a deviation from the applicable standard.
 - a. A copy of each notification and report that the permittee submitted to comply with this subpart, and the documentation supporting each notification and report.
 - b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or mass fraction of

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coating solids, the permittee must keep a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

- c. For each compliance period, the records specified below.
 - i. A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used.
 - ii. A record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.4551 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of §63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.4551.
- d. A record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
- e. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
- f. A record of the mass fraction of coating solids for each coating used during each compliance period.
- g. If the permittee uses an allowance in Equation 1 of §63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.4551(e)(4), the permittee must keep records of the information specified below.
 - i. The name and address of each TSDF to which the permittee sent waste materials for which the permittee uses an allowance in Equation 1 of §63.4551, a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.
 - ii. Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of §63.4551.
 - iii. The methodology used in accordance with §63.4551(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources

for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

- h. The permittee must keep records of the date, time, and duration of each deviation.

[40 CFR §63.4530]

2. The records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years.

[40 CFR §63.4531]

3. To demonstrate initial compliance, the permittee must meet the applicable emission limit in term A.II.4. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which the permittee uses the compliant material option or the emission rate with add-on controls option. The permittee does not need to re-determine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the permittee has documentation showing that the permittee received back the exact same materials that were sent off-site) and reused in the coating operation for which the permittee uses the emission rate without add-on controls option. If the permittee uses coatings, thinners and/or other additives, or cleaning materials that have been reclaimed onsite, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

- a. Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.4541(a).
- b. Determine the mass fraction of coating solids. Determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during each month according to the requirements in §63.4541(b).
- c. Determine the density of each material. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 and other such information sources, the test results

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will take precedence unless, after consultation the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct. If the permittee purchases materials or monitor consumption by weight instead of volume, the permittee does not need to determine material density. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of §63.4551.

- d. Determine the volume of each material used. Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, the permittee does not need to determine the volume of each material used. Instead, the permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of §63.4551.
- e. Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of §63.4551.
 - i. Calculate the kg organic HAP in the coatings used during the month using Equation 1A of §63.4551.
 - ii. Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of §63.4551.
 - iii. Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of §63.4551.
 - iv. If the permittee chooses to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of §63.4551, then the permittee must determine the mass according to paragraphs below.
 - (1) The permittee may only include waste materials in the determination that are generated by coating operations in the affected source for which the permittee uses Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. The permittee may not include organic HAP contained in wastewater.
 - (2) The permittee must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in

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your determination any waste materials sent to a TSD during a month if the permittee has already included them in the amount collected and stored during that month or a previous month.

- (3) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (2) above.
 - (4) The permittee must document the methodology used to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.4530(g). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.
- f. Calculate the total mass of coating solids used. Determine the total mass of coating solids used, kg, which is the combined mass of coating solids for all the coatings used during each month, using Equation 2 of §63.4551.
- g. Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per kg (lb) coating solids used, using Equation 3 of §63.4551.
- h. Compliance demonstration. The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section must be less than or equal to the applicable emission limit in term A.II.4. The permittee must keep all records as required by terms A.IV.1 and A.IV.2. As part of the notification of compliance status required by §63.4510, the permittee must identify the coating operation(s) for which the permittee used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the

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initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.4490, determined according to the procedures in this section.

[40 CFR §63.4551]

4. To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to term A.IV.3, must be less than or equal to the applicable emission limit in term A.II.4. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in term A.II.8 is the end of a compliance period consisting of that month and the preceding 11 months. The permittee must perform the calculations in term A.IV.3. on a monthly basis using data from the previous 12 months of operation.
5. If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in term A.II.4, this is a deviation from the emission limitation for that compliance period and must be reported as specified in terms A.V.1.b(6) and A.V.2.e.
- 6c. As part of each semiannual compliance report required by term A.V.2, the permittee must identify the coating operation(s) for which the permittee used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the permittee must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in term A.II.4, determined according to term A.IV.3.

V. Reporting Requirements

1. The permittee must submit the notifications in 40 CFR 63 Subpart P PPP paragraphs §63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the permittee by the dates specified in those sections, except as provided in paragraphs (a) and (b) below:
 - a. Initial notification. The permittee must submit the initial notification no later than 1 year after April 19, 2004.
 - b. Notification of compliance status. The permittee must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in term A.II.8. The notification of compliance status must contain the information specified below and in §63.9(h):

- i. Company name and address.
- ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- iii. Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in term A.II.8.
- iv. Identification of the compliance option or options specified in term A.II.5. that the permittee used on each coating operation in the affected source during the initial compliance period.
- v. Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
- vi. If the permittee had a deviation, include the information below:
 - (1) A description and statement of the cause of the deviation.
 - (2) If the permittee failed to meet the applicable emission limit in term A.II.4, include all the calculations the permittee used to determine the kg (lb) organic HAP emitted per kg (lb) coating solids used. The permittee does not need to submit information provided by the materials' suppliers or manufacturers, or test reports.
- vii. For each of the data items listed below, that are required by the compliance option(s) the permittee used to demonstrate compliance with the emission limit, include an example of how the permittee determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.4541(a), (b), or (c). The permittee does not need to submit copies of any test reports.
 - (1) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.
 - (2) Mass fraction of coating solids for one coating.
 - (3) Density for one coating, one thinner and/or other additive, and one cleaning material.
 - (4) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.4551.
- viii. The calculation of kg (lb) organic HAP emitted per kg (lb) coating solids, the calculation of the total mass of organic HAP emissions for each month; the calculation of the total mass of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.4551.

[40 CFR §63.4510]

2. Semiannual compliance reports.

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The permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a) through (g) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (b) of this section.

- a. Dates. Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), the permittee must prepare and submit each semiannual compliance report according to the dates specified below. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - i. The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in term A.II.8 and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.
 - ii. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - iii. Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - iv. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.
- b. Inclusion with title V report. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- c. General requirements. The semiannual compliance report must contain the information specified below and the information specified in (d).
 - i. Company name and address.
 - ii. Statement by a responsible official with that official's name, title, and signature,

- certifying the truth, accuracy, and completeness of the content of the report.
- iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - iv. Identification of the compliance option or options specified in §63.4491 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee must report the beginning and ending dates for each option the permittee used.
 - v. If the permittee used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.4491(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
- d. No deviations. If there were no deviations from the emission limitations in term A.II.4, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.
- e. Deviations. If there was a deviation from the applicable emission limit in term A.II.4, the semiannual compliance report must contain the information listed below.
- i. The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit.
 - ii. The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.4551; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4551(e)(4). The permittee does not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).
 - iii. A statement of the cause of each deviation.

[40 CFR §63.4520]

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

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Flex machine No. 2 for flexible films with thermal oxidizer	OAC rule 3745-31-05(A)(3)	0.22 lb OC/hr and 0.96 TPY OC, excluding cleanup materials 0.41 TPY of OC emissions from cleanup materials for emissions units P001, P003, P004, P005, combined. See Terms A.2.a - A.2.e., B.1 and B.2. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart PPPP.
	OAC rule 3745-21-07(G)(1)	The oven is exempt per OAC rule 3745-21-07(G)(9)(d). The emission limitation specified by this rule for the dipping and cleanup operation is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-21-07(G)(2)	See Part II Terms A.I. through A.V.
	40 CFR 63, Subpart PPPP - Surface Coating of Plastic Parts and Products	

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a permanent total enclosure followed by a thermal oxidizer with at least a 95% destruction efficiency, by weight, compliance with 40 CFR 63, Subpart PPPP and compliance with the emissions limitations.
- 2.b** The permittee shall control OC emissions from this emissions unit by use of a permanent total enclosure followed by a thermal oxidizer with a destruction efficiency of at least 95%, by weight.
- 2.c** The permittee has the option to perform an additional demonstration to show that the permanent total enclosure (PTE) cannot be compromised, under normal plant conditions, when the emissions unit is in operation [i.e., air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened] in lieu of installing, maintaining, and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record-keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified above, to show that the PTE cannot be comprised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, recordkeeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

- 2.d** The maximum organic cleanup material usage for emissions units P001, P003, P004 and P005 combined shall not exceed 16,488 pounds per year.

The emissions are controlled by the use of a permanent total enclosure followed by a thermal oxidizer with a destruction efficiency of at least 95% by weight.

- 2.e** The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

II. Operational Restrictions

1. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.
2. The average temperature of the combustion chamber within the thermal oxidizer, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1450 degrees Fahrenheit or the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, whichever is lower.

III. Monitoring and/or Recordkeeping Requirements

1. 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.
2. The permittee shall collect and record the following information for each day for the control equipment:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1450 degrees Fahrenheit or the average temperature established as part of the most recent performance test that demonstrated compliance, whichever is lower.
 - b. A log of all downtime* periods for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

* The control device downtime is defined as any time when the emissions unit is in operation, employing organic compounds, and the thermal oxidizer is not in operation. Monitoring equipment downtime is defined as any time the emission unit is in operation, employing organic compounds, and the temperature monitoring equipment is not functioning.

3. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the differential pressure between the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with changes as deemed necessary by the permittee.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).

- b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

4. The permittee shall maintain the following monthly records for this emissions unit:
- a. The number of hours the emissions unit was in operation during the month. The permittee may monitor a surrogate parameter for determining the hours of operation.
 - b. The monthly OC emissions from the process, in pounds per month, as calculated below:

Monthly OC emissions from the process
 = number of hours of operation * 4.3 lbs OC/hr¹ * (1-control efficiency during the most recent performance test that demonstrated compliance).
¹maximum hourly uncontrolled emissions = 4.3 lbs OC/hr

These records shall be summarized at the end of the calendar year.

5. The permittee shall maintain monthly records of the following information for emissions units P001, P003, P004 and P005 combined:
- a. The identification of each liquid organic cleanup material employed.
 - b. The amount of liquid organic material employed* in pounds.
 - c. The annual OC emissions from liquid organic cleanup materials, in tons per year, as calculated below:

Annual OC emissions from cleanup
 = Annual OC emissions from cleanup * (1-control efficiency during the most recent performance test that demonstrated compliance) / 2000 lb/ton

* Records of cleanup material employed may include mass balance calculations that include material recovered from the process for reuse, recycle or disposal.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
2. The permittee shall submit annual reports which identify the total OC emissions for this emissions unit and the total organic cleanup material usage for emissions units P001, P003, P004 and P005, combined. The reports shall be submitted by January 31 of each year.

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3. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in term A.II.2.
4. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in term A.II.1.

V. Testing Requirements

1. Emission Limitations:
95% by weight control efficiency for OC emissions

Applicable Compliance Methods:

Emissions units P001, P003, P004 and P005 are vented to a common thermal oxidizer. The permittee shall conduct, or have conducted, emission testing for emissions units P001, P003, P004 and P005 in accordance with the following requirements:

- a. Testing shall be conducted for the combined operation of emissions unit P001, P003, P004 and P005. Testing required by this permit shall be conducted within 90 days of the startup of emissions unit P005.
- b. The emission testing shall be conducted to demonstrate compliance with the OC destruction efficiency for the thermal oxidizer of 95%, by weight and to verify the 100% capture efficiency.
- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved Hamilton County Department of Environmental Services.
- d. 40 CFR 63 Subpart P PPP requirements, if applicable and the following test methods shall be employed to demonstrate compliance with the minimum overall control efficiency for OC:

OC: Methods 1 through 4 and 25 or 25A of 40 CFR, Part 60, Appendix A, or other USEPA Reference Method with written approval from Hamilton County Environmental Services.

- e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the

percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol. 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.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests. Personnel from Ohio EPA and/or the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emission tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

2. OC Emissions Limitations
0.22 lb/hr OC, 0.96 TPY OC from process
0.41 TPY OC from cleanup materials for emissions units P001, P003, P004 and P005 combined

Applicable Compliance Method

The hourly OC emissions limitation is based on maximum capacity of the equipment. Compliance with the annual OC emissions limitations shall be demonstrated by the record keeping in terms and

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conditions A.III.4 and A.III.5.

3. Operational Restriction

The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.

Applicable Compliance Method

Compliance with this operational limitation shall be based upon the monitoring in term and condition A.III.3.

4. **Operational Restriction**
The average temperature of the combustion chamber within the thermal oxidizer, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1450 degrees Fahrenheit or the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, whichever is lower.

Applicable Compliance Method

Compliance with this operational limitation shall be based upon the monitoring in term and condition A.III.2.

5. **Operational Restriction**
16,488 pounds per year of organic cleanup material for emissions units P001, P003, P004 and P005 combined.

Applicable Compliance Method

Compliance with the annual organic cleanup material usage limitation shall be demonstrated by the record keeping in terms and conditions A.III.5.

VI. Miscellaneous Requirements

1. The requirements of this Permit to Install supercedes the requirements in PTI 14-4743 as issued on June 30, 1999 and PTI 14-4812 as issued on October 20, 1999.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Flex machine for flexible films with thermal oxidizer - No. 2		

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

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P003 - Flex machine for flexible films with thermal oxidizer - No. 3	OAC rule 3745-31-05(A)(3)	40 CFR 63, Subpart PPPP - Surface Coating of Plastic Parts and Products
	OAC rule 3745-21-07(G)(1)	
	OAC rule 3745-21-07(G)(2)	

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Applicable Emissions
Limitations/Control
Measures

0.22 lb OC/hr and 0.96 TPY
OC, excluding cleanup
materials

0.41 TPY of OC emissions
from cleanup materials for
emissions units P001, P003,
P004, P005, combined.

See Terms A.2.a - A.2.e.,
B.1 and B.2.

The requirements of this rule
also include compliance with
the requirements of 40 CFR
Part 63, Subpart PPPP.

The oven is exempt per
OAC rule
3745-21-07(G)(9)(d).

The emission limitation
specified by this rule for the
dipping and cleanup
operation is less stringent
than the emission limitation
established pursuant to OAC
rule 3745-31-05 (A)(3).

See Part II Terms A.I.
through A.V.

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a permanent total enclosure followed by a thermal oxidizer with at least a 95% destruction efficiency, by weight, compliance with 40 CFR 63, Subpart PPPP and compliance with the emissions limitations.
- 2.b** The permittee shall control OC emissions from this emissions unit by use of a permanent total enclosure followed by a thermal oxidizer with a destruction efficiency of at least 95%, by weight.
- 2.c** The permittee has the option to perform an additional demonstration to show that the permanent total enclosure (PTE) cannot be compromised, under normal plant conditions, when the emissions unit is in operation [i.e., air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened] in lieu of installing, maintaining, and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record-keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified above, to show that the PTE cannot be comprised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, recordkeeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

- 2.d** The maximum organic cleanup material usage for emissions units P001, P003, P004 and P005 combined shall not exceed 16,488 pounds per year.

The emissions are controlled by the use of a permanent total enclosure followed by a thermal oxidizer with a destruction efficiency of at least 95% by weight.

- 2.e** The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with

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these limits.

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II. Operational Restrictions

1. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.
2. The average temperature of the combustion chamber within the thermal oxidizer, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1450 degrees Fahrenheit or the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, whichever is lower.

III. Monitoring and/or Recordkeeping Requirements

1. 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.
 2. The permittee shall collect and record the following information for each day for the control equipment:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1450 degrees Fahrenheit or the average temperature established as part of the most recent performance test that demonstrated compliance, whichever is lower.
 - b. A log of all downtime* periods for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- * The control device downtime is defined as any time when the emissions unit is in operation, employing organic compounds, and the thermal oxidizer is not in operation. Monitoring equipment downtime is defined as any time the emission unit is in operation, employing organic compounds, and the temperature monitoring equipment is not functioning.
3. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the differential pressure between the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed,

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calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with changes as deemed necessary by the permittee.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
4. The permittee shall maintain the following monthly records for this emissions unit:
- a. The number of hours the emissions unit was in operation during the month. The permittee may monitor a surrogate parameter for determining the hours of operation.
 - b. The monthly OC emissions from the process, in pounds per month, as calculated below:

Monthly OC emissions from the process
= number of hours of operation * 4.3 lbs OC/hr¹ * (1-control efficiency during the most recent performance test that demonstrated compliance).
¹maximum hourly uncontrolled emissions = 4.3 lbs OC/hr

These records shall be summarized at the end of the calendar year.

5. The permittee shall maintain monthly records of the following information for emissions units P001, P003, P004 and P005 combined:
- a. The identification of each liquid organic cleanup material employed.
 - b. The amount of liquid organic material employed* in pounds.
 - c. The annual OC emissions from liquid organic cleanup materials, in tons per year, as calculated below:

Annual OC emissions from cleanup
= Annual OC emissions from cleanup * (1-control efficiency during the most recent performance test that demonstrated compliance) / 2000 lb/ton

* Records of cleanup material employed may include mass balance calculations that include material recovered from the process for reuse, recycle or disposal.

IV. Reporting Requirements

Emissions Unit ID: P003

1. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
2. The permittee shall submit annual reports which identify the total OC emissions for this emissions unit and the total organic cleanup material usage for emissions units P001, P003, P004 and P005, combined. The reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in term A.II.2.
4. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in term A.II.1.

V. Testing Requirements

1. Emission Limitations:
95% by weight control efficiency for OC emissions

Applicable Compliance Methods:

Emissions units P001, P003, P004 and P005 are vented to a common thermal oxidizer. The permittee shall conduct, or have conducted, emission testing for emissions units P001, P003, P004 and P005 in accordance with the following requirements:

- a. Testing shall be conducted for the combined operation of emissions unit P001, P003, P004 and P005. Testing required by this permit shall be conducted within 90 days of the startup of emissions unit P005.
- b. The emission testing shall be conducted to demonstrate compliance with the OC destruction efficiency for the thermal oxidizer of 95%, by weight and to verify the 100% capture efficiency.
- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved Hamilton County Department of Environmental Services.
- d. 40 CFR 63 Subpart P PPP requirements, if applicable and the following test methods shall be employed to demonstrate compliance with the minimum overall control efficiency for OC:

OC: Methods 1 through 4 and 25 or 25A of 40 CFR, Part 60, Appendix A, or other USEPA Reference Method with written approval from Hamilton County Environmental Services.

- e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol. 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.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests. Personnel from Ohio EPA and/or the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emission tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

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Emissions Unit ID: P003

2. OC Emissions Limitations
0.22 lb/hr OC, 0.96 TPY OC from process
0.41 TPY OC from cleanup materials for emissions units P001, P003, P004 and P005 combined

Applicable Compliance Method

The hourly OC emissions limitation is based on maximum capacity of the equipment. Compliance with the annual OC emissions limitations shall be demonstrated by the record keeping in terms and conditions A.III.4 and A.III.5.

3. Operational Restriction
The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.

Applicable Compliance Method

Compliance with this operational limitation shall be based upon the monitoring in term and condition A.III.3.

4. Operational Restriction

The average temperature of the combustion chamber within the thermal oxidizer, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1450 degrees Fahrenheit or the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, whichever is lower.

Applicable Compliance Method

Compliance with this operational limitation shall be based upon the monitoring in term and condition A.III.2.

5. Operational Restriction

16,488 pounds per year of organic cleanup material for emissions units P001, P003, P004 and P005 combined.

Applicable Compliance Method

Compliance with the annual organic cleanup material usage limitation shall be demonstrated by the record keeping in terms and conditions A.III.5.

VI. Miscellaneous Requirements

1. The requirements of this Permit to Install supercedes the requirements in PTI 14-5283 as issued on April 11, 2002.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Flex machine for flexible films with thermal oxidizer - No. 3		

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

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Emissions Unit ID: P003

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P004 - Flex machine for flexible films with thermal oxidizer - No. 4	OAC rule 3745-31-05(A)(3)	40 CFR 63, Subpart PPPP - Surface Coating of Plastic Parts and Products
	OAC rule 3745-21-07(G)(1)	
	OAC rule 3745-21-07(G)(2)	

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Emissions Unit ID: P004

Applicable Emissions
Limitations/Control
Measures

0.22 lb OC/hr and 0.96 TPY
OC, excluding cleanup
materials

0.41 TPY of OC emissions
from cleanup materials for
emissions units P001, P003,
P004, P005, combined.

See Terms A.2.a - A.2.e.,
B.1 and B.2.

The requirements of this rule
also include compliance with
the requirements of 40 CFR
Part 63, Subpart PPPP.

The oven is exempt per
OAC rule
3745-21-07(G)(9)(d).

The emission limitation
specified by this rule for the
dipping and cleanup
operation is less stringent
than the emission limitation
established pursuant to OAC
rule 3745-31-05 (A)(3).

See Part II Terms A.I.
through A.V.

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a permanent total enclosure followed by a thermal oxidizer with at least a 95% destruction efficiency, by weight, compliance with 40 CFR 63, Subpart PPPP and compliance with the emissions limitations.
- 2.b** The permittee shall control OC emissions from this emissions unit by use of a permanent total enclosure followed by a thermal oxidizer with a destruction efficiency of at least 95%, by weight.
- 2.c** The permittee has the option to perform an additional demonstration to show that the permanent total enclosure (PTE) cannot be compromised, under normal plant conditions, when the emissions unit is in operation [i.e., air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened] in lieu of installing, maintaining, and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record-keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified above, to show that the PTE cannot be comprised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, recordkeeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

- 2.d** The maximum organic cleanup material usage for emissions units P001, P003, P004 and P005 combined shall not exceed 16,488 pounds per year.

The emissions are controlled by the use of a permanent total enclosure followed by a thermal oxidizer with a destruction efficiency of at least 95% by weight.

- 2.e** The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to

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demonstrate compliance with these limits.

II. Operational Restrictions

1. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.
2. The average temperature of the combustion chamber within the thermal oxidizer, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1450 degrees Fahrenheit or the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, whichever is lower.

III. Monitoring and/or Recordkeeping Requirements

1. 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.
 2. The permittee shall collect and record the following information for each day for the control equipment:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1450 degrees Fahrenheit or the average temperature established as part of the most recent performance test that demonstrated compliance, whichever is lower.
 - b. A log of all downtime* periods for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- * The control device downtime is defined as any time when the emissions unit is in operation, employing organic compounds, and the thermal oxidizer is not in operation. Monitoring equipment downtime is defined as any time the emission unit is in operation, employing organic compounds, and the temperature monitoring equipment is not functioning.
3. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the differential pressure between the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed,

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calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with changes as deemed necessary by the permittee.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
4. The permittee shall maintain the following monthly records for this emissions unit:
- a. The number of hours the emissions unit was in operation during the month. The permittee may monitor a surrogate parameter for determining the hours of operation.
 - b. The monthly OC emissions from the process, in pounds per month, as calculated below:

Monthly OC emissions from the process
 = number of hours of operation * 4.3 lbs OC/hr¹ * (1-control efficiency during the most recent performance test that demonstrated compliance).
¹maximum hourly uncontrolled emissions = 4.3 lbs OC/hr

These records shall be summarized at the end of the calendar year.

5. The permittee shall maintain monthly records of the following information for emissions units P001, P003, P004 and P005 combined:
- a. The identification of each liquid organic cleanup material employed.
 - b. The amount of liquid organic material employed* in pounds.
 - c. The annual OC emissions from liquid organic cleanup materials, in tons per year, as calculated below:

Annual OC emissions from cleanup
 = Annual OC emissions from cleanup * (1-control efficiency during the most recent performance test that demonstrated compliance) / 2000 lb/ton

* Records of cleanup material employed may include mass balance calculations that include material recovered from the process for reuse, recycle or disposal.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.
2. The permittee shall submit annual reports which identify the total OC emissions for this emissions unit and the total organic cleanup material usage for emissions units P001, P003, P004 and P005, combined. The reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in term A.II.2.
4. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in term A.II.1.

V. Testing Requirements

1. Emission Limitations:
95% by weight control efficiency for OC emissions

Applicable Compliance Methods:

Emissions units P001, P003, P004 and P005 are vented to a common thermal oxidizer. The permittee shall conduct, or have conducted, emission testing for emissions units P001, P003, P004 and P005 in accordance with the following requirements:

- a. Testing shall be conducted for the combined operation of emissions unit P001, P003, P004 and P005. Testing required by this permit shall be conducted within 90 days of the startup of emissions unit P005.
- b. The emission testing shall be conducted to demonstrate compliance with the OC destruction efficiency for the thermal oxidizer of 95%, by weight and to verify the 100% capture efficiency.
- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved Hamilton County Department of Environmental Services.
- d. 40 CFR 63 Subpart P PPPP requirements, if applicable and the following test methods shall

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be employed to demonstrate compliance with the minimum overall control efficiency for OC:

OC: Methods 1 through 4 and 25 or 25A of 40 CFR, Part 60, Appendix A, or other USEPA Reference Method with written approval from Hamilton County Environmental Services.

- e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol. 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.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests. Personnel from Ohio EPA and/or the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emission tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

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2. OC Emissions Limitations
0.22 lb/hr OC, 0.96 TPY OC from process
0.41 TPY OC from cleanup materials for emissions units P001, P003, P004 and P005 combined

Applicable Compliance Method

The hourly OC emissions limitation is based on maximum capacity of the equipment. Compliance with the annual OC emissions limitations shall be demonstrated by the record keeping in terms and conditions A.III.4 and A.III.5.

3. Operational Restriction
The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.

Applicable Compliance Method

Compliance with this operational limitation shall be based upon the monitoring in term and condition A.III.3.

4. Operational Restriction
The average temperature of the combustion chamber within the thermal oxidizer, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1450 degrees Fahrenheit or the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, whichever is lower.

Applicable Compliance Method

Compliance with this operational limitation shall be based upon the monitoring in term and condition A.III.2.

5. Operational Restriction
16,488 pounds per year of organic cleanup material for emissions units P001, P003, P004 and P005 combined.

Applicable Compliance Method

Compliance with the annual organic cleanup material usage limitation shall be demonstrated by the record keeping in terms and conditions A.III.5.

VI. Miscellaneous Requirements

1. The requirements of this Permit to Install supercedes the requirements in PTI 14-5337 as issued on August 22, 2002.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - Flex machine for flexible films with thermal oxidizer - No.5		

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

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P005 - Flex machine for flexible films with thermal oxidizer - No.5	OAC rule 3745-31-05(A)(3)	40 CFR 63, Subpart PPPP - Surface Coating of Plastic Parts and Products
	OAC rule 3745-21-07(G)(1)	
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions
Limitations/Control
Measures

0.29 lb OC/hr and 1.27 TPY
OC, excluding cleanup
materials

0.41 TPY of OC emissions
from cleanup materials for
emissions units P001, P003,
P004, P005, combined.

See Terms A.2.a - A.2.e.,
B.1 and B.2.

The requirements of this rule
also include compliance with
the requirements of 40 CFR
Part 63, Subpart PPPP.

The oven is exempt per
OAC rule
3745-21-07(G)(9)(d).

The emission limitation
specified by this rule for the
dipping and cleanup
operation is less stringent
than the emission limitation
established pursuant to OAC
rule 3745-31-05 (A)(3).

See Part II Terms A.I.
through A.V.

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a permanent total enclosure followed by a thermal oxidizer with at least a 95% destruction efficiency, by weight, compliance with 40 CFR 63, Subpart PPPP and compliance with the emissions limitations.
- 2.b** The permittee shall control OC emissions from this emissions unit by use of a permanent total enclosure followed by a thermal oxidizer with a destruction efficiency of at least 95%, by weight.
- 2.c** The permittee has the option to perform an additional demonstration to show that the permanent total enclosure (PTE) cannot be compromised, under normal plant conditions, when the emissions unit is in operation [i.e., air flow through the PTE to the control device is always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened] in lieu of installing, maintaining, and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE cannot be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record-keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration specified above, to show that the PTE cannot be comprised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, recordkeeping, and reporting requirements specified below (see sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

- 2.d** The maximum organic cleanup material usage for emissions units P001, P003, P004 and P005 combined shall not exceed 16,488 pounds per year.

The emissions are controlled by the use of a permanent total enclosure followed by a thermal oxidizer with a destruction efficiency of at least 95% by weight.

- 2.e** The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

II. Operational Restrictions

1. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.
2. The average temperature of the combustion chamber within the thermal oxidizer, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1450 degrees Fahrenheit or the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, whichever is lower.

III. Monitoring and/or Recordkeeping Requirements

1. 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.
 2. The permittee shall collect and record the following information for each day for the control equipment:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1450 degrees Fahrenheit or the average temperature established as part of the most recent performance test that demonstrated compliance, whichever is lower.
 - b. A log of all downtime* periods for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- * The control device downtime is defined as any time when the emissions unit is in operation, employing organic compounds, and the thermal oxidizer is not in operation. Monitoring equipment downtime is defined as any time the emission unit is in operation, employing organic compounds, and the temperature monitoring equipment is not functioning.
3. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the differential pressure between the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations,

Emissions Unit ID: P005

instructions and operating manuals, with changes as deemed necessary by the permittee.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s).
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
4. The permittee shall maintain the following monthly records for this emissions unit:
- a. The number of hours the emissions unit was in operation during the month. The permittee may monitor a surrogate parameter for determining the hours of operation.
 - b. The monthly OC emissions from the process, in pounds per month, as calculated below:

Monthly OC emissions from the process
= number of hours of operation * 5.7 lbs OC/hr¹ * (1-control efficiency during the most recent performance test that demonstrated compliance).
¹maximum hourly uncontrolled emissions = 5.7 lbs OC/hr

These records shall be summarized at the end of the calendar year.

5. The permittee shall maintain monthly records of the following information for emissions units P001, P003, P004 and P005 combined:
- a. The identification of each liquid organic cleanup material employed.
 - b. The amount of liquid organic material employed* in pounds.
 - c. The annual OC emissions from liquid organic cleanup materials, in tons per year, as calculated below:

Annual OC emissions from cleanup
= Annual OC emissions from cleanup * (1-control efficiency during the most recent performance test that demonstrated compliance) / 2000 lb/ton

* Records of cleanup material employed may include mass balance calculations that include material recovered from the process for reuse, recycle or disposal.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this Permit to Install.

2. The permittee shall submit annual reports which identify the total OC emissions for this emissions unit and the total organic cleanup material usage for emissions units P001, P003, P004 and P005, combined. The reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation specified in term A.II.2.
4. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in term A.II.1.

V. Testing Requirements

1. Emission Limitations:
95% by weight control efficiency for OC emissions

Applicable Compliance Methods:

Emissions units P001, P003, P004 and P005 are vented to a common thermal oxidizer. The permittee shall conduct, or have conducted, emission testing for emissions units P001, P003, P004 and P005 in accordance with the following requirements:

- a. Testing shall be conducted for the combined operation of emissions unit P001, P003, P004 and P005. Testing required by this permit shall be conducted within 90 days of the startup of emissions unit P005.
- b. The emission testing shall be conducted to demonstrate compliance with the OC destruction efficiency for the thermal oxidizer of 95%, by weight and to verify the 100% capture efficiency.
- c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved Hamilton County Department of Environmental Services.
- d. 40 CFR 63 Subpart P requirements, if applicable and the following test methods shall be employed to demonstrate compliance with the minimum overall control efficiency for OC:

OC: Methods 1 through 4 and 25 or 25A of 40 CFR, Part 60, Appendix A, or other USEPA Reference Method with written approval from Hamilton County Environmental

Emissions Unit ID: P005

Services.

- e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol. 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.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests. Personnel from Ohio EPA and/or the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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.

A comprehensive written report on the results of the emission tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

2. OC Emissions Limitations

0.29 lb/hr OC, 1.27 TPY OC from process

0.41 TPY OC from cleanup materials for emissions units P001, P003, P004 and P005 combined

Da Lite Screen Company Inc

PTI Application: 14-05635

Issued

Facility ID: 1431053380

Emissions Unit ID: P005

Applicable Compliance Method

The hourly OC emissions limitation is based on maximum capacity of the equipment. Compliance with the annual OC emissions limitations shall be demonstrated by the record keeping in terms and conditions A.III.4 and A.III.5.

3. Operational Restriction

The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.

Applicable Compliance Method

Compliance with this operational limitation shall be based upon the monitoring in term and condition A.III.3.

4. **Operational Restriction**
The average temperature of the combustion chamber within the thermal oxidizer, for any 3-hour block of time while the emissions unit is in operation, shall not be less than 1450 degrees Fahrenheit or the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, whichever is lower.

Applicable Compliance Method

Compliance with this operational limitation shall be based upon the monitoring in term and condition A.III.2.

5. **Operational Restriction**
16,488 pounds per year of organic cleanup material for emissions units P001, P003, P004 and P005 combined.

Applicable Compliance Method

Compliance with the annual organic cleanup material usage limitation shall be demonstrated by the record keeping in terms and conditions A.III.5.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - Flex machine for flexible films with thermal oxidizer - No.5		

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