Facility ID: 0857090718 Issuance type: Final State Permit To Operate

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

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

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

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

Facility ID: 0857090718 Emissions Unit ID: K053 Issuance type: Final State Permit To Operate

Go to the top of this document

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Adhesive Coater/Laminator #267	PTI #08-3372	4.77 lbs/hr, 114.48 lbs/day, 1.78 tons/month, 14.9 TPY VOC; 700 gallons/day (427 gal/day excluding water), 182,000 gallons/year (110,020 gal/year excluding water) adhesive usage; 240 gallons/day (108 gal/day excluding water) 62,400 gallons/year (28,080 gal/year excluding water) silicone usage
Adhesive Coater/Laminator #267	40 CFR Part 60 Subpart RR	VOC content shall not exceed the following: 0.030 lb/gal (0.046 lb/gal excluding water), and 0.010 Kg VOC/Kg solids for the adhesives; 0.390 lb/gal (0.86 lb/gal excluding water), and 0.113 Kg VOC/Kg solids for silicone

2. **Additional Terms and Conditions**

   (a) The 4.77 lbs/hr limit was established for PTI purposes to reflect the potential to emit for the emission unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
   Each silicone and adhesive employed in this emissions unit shall comply with the VOC content limitation specified above.

B. **Operational Restrictions**

1. None

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

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

   (a) the name and identification number of each silicone and adhesive, as applied;

   (b) the VOC content of each silicone and adhesive, lbs/gal and Kg VOC/Kg solids;

   (c) the amounts of silicones and adhesives applied, in (1) gallons and (2) gallons (excluding water); and

   (d) the total VOC emissions from silicones and adhesives, in lbs/day.

D. **Reporting Requirements**

1. The permittee shall notify the Director in writing of any daily record showing the use of noncomplying silicones or adhesives. This notification shall include a copy of such record and shall be sent to the Director within 30 days following the end of the calendar month.

2. The permittee shall notify the Director in writing of any daily record showing that the coating line employs more than the applicable maximum daily silicone and/or adhesive usage limit. This notification shall include a copy of such record shall be sent to the Director within 45 days after the exceedance occurs.

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation -
4.77 lbs/hour VOC allowable emission rate

Applicable Compliance Method -
Compliance shall be determined by dividing the daily VOC emissions (see E.1.b.) by the number of operating hours per day.
Emission Limitation -
114.48 lbs/day VOC allowable emission rate

Applicable Compliance Method -
Compliance shall be determined by multiplying the daily silicone and adhesive usages by the respective VOC contents and summing the products to obtain the daily VOC emissions.
Emission Limitation -
1.78 tons/month VOC allowable emission rate

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in (C)(1) and shall be the sum of the daily VOC emissions for the month.
Emission Limitation -
14.9 TPY VOC allowable emission rate

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in (C)(1) and shall be the sum of the 12 monthly VOC emission rates for the calendar year.
Emission Limitation -
700 gallons/day (427 gal/day minus water) adhesive usage and 240 gallons/day (108 gal/day minus water) silicone usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in (C)(1).
Emission Limitation -
182,000 gallons/year (110,020 gal/year minus water) adhesive usage and 62,400 gallons/year (28,080 gal/year minus water) silicone usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in (C)(1) and shall be the sum of the daily usage for each month and the totalling of the individual 12 monthly silicone and adhesive usage records for the calendar year.
Emission Limitation -
0.030 lb/gal (0.046 lb/gal excluding water), 0.010 Kg VOC/Kg solids for adhesives; and 0.390 lb/gal (0.86 lb/gal excluding water), 0.113 Kg VOC/Kg solids for silicones.

Applicable Compliance Method -
The manufacturers' formulation data as specified in 40 CFR Part 60 Subpart RR shall be used to determine the VOC content for the adhesives and silicones.

F. **Miscellaneous Requirements**

1. The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, and disposal of any waste material generated by the operation of the emissions unit.

2. 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.