Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

6/23/2015

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. CHRIS ALI
ALI INDUSTRIES, INC.
747 XENIA DR
FAIRBORN, OH 45324

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0829060557
Permit Number: P0112513
Permit Type: Renewal
County: Greene

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: RAPCA

Response to Comments

Facility ID:	0829060557
Facility Name:	ALI INDUSTRIES, INC.
Facility Description:	Adhesive Paper Coating Process with Two Roll Coaters and Dip Tanks and One Flexographic Printer
Facility Address:	747 XENIA DRIVE FAIRBORN, OH 45324 Greene County
Permit:	P0112513, Permit-To-Install and Operate - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Xenia Daily Gazette on 05/22/2015. The comment period ended on 06/21/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: None

b. Response: None

Ohio Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
ALI INDUSTRIES, INC.

Facility ID:	0829060557
Permit Number:	P0112513
Permit Type:	Renewal
Issued:	6/23/2015
Effective:	6/23/2015
Expiration:	6/23/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
ALI INDUSTRIES, INC.

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Authorization

Facility ID:	0829060557
Application Number(s):	A0046191, A0047904
Permit Number:	P0112513
Permit Description:	Renewal FEPTIO for emissions units K003 - flexographic printer, and drying oven, with a permanent total enclosure and regenerative thermal oxidizer; and P001 - adhesive spray for manufacturing abrasive belts.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	6/23/2015
Effective Date:	6/23/2015
Expiration Date:	6/23/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ALI INDUSTRIES, INC.
747 XENIA DRIVE
FAIRBORN, OH 45324

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0112513
Permit Description: Renewal FEPTIO for emissions units K003 - flexographic printer, and drying oven, with a permanent total enclosure and regenerative thermal oxidizer; and P001 - adhesive spray for manufacturing abrasive belts.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**K003**
Company Equipment ID:	Adhesive Roll Coater
Superseded Permit Number:	08-04850
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P001**
Company Equipment ID:	inline gluer machine for abrasive belts
Superseded Permit Number:	08-04923
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. 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).

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

      (1) None.

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

      (1) B.2. through B.6

2. The facility wide emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons on rolling 12-month basis for any individual HAP and 24.9 tons on a rolling 12-month basis for the combination of all HAPs.

3. The permittee shall collect and record the following information each month for the entire facility:

   a) The identification and volume, in gallons, of each coating material employed.

   b) The identification and volume, in gallons, of each cleanup material employed.

   c) The individual hazardous air pollutant (HAP)* content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

   d) The total combined HAPs content of each coating material, in pounds of combined HAPs per gallon, as applied [the sum of all the individual HAP contents from B.3.c)].

   e) The individual hazardous air pollutant (HAP)* content for each HAP of each cleanup material, in pounds of individual HAP per gallon, as applied.

   f) The total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon, as applied [the sum of all the individual HAP contents from B.3.e)].

   g) The total uncontrolled individual HAP emissions for each HAP from all coating materials employed, in tons per month [for each HAP, the sum of B.3.a) times B.3.c) for each coating material].

   h) The total uncontrolled combined HAPs emissions from all coating materials employed, in tons per month [the sum of B.3.a) times B.3.d) for each coating material].

   i) The total uncontrolled individual HAP emissions for each HAP from all cleanup materials employed, in tons per month [for each HAP, the sum of B.3.b) times B.3.e) for each cleanup material].

   j) The total uncontrolled combined HAPs emissions from all cleanup materials employed, in tons per month [the sum of B.3.b) times B.3.f) for each cleanup material].

k) The total calculated controlled individual HAP emissions for each HAP from all coating materialsemployed, in tons per month [B.3.g) multiplied by a factor of (1 - the overall control efficiency), using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance].

l) The total calculated controlled combined HAPs emissions from all coating materials employed, in tons per month [B.3.h) multiplied by a factor of (1 - the overall control efficiency), using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance].

m) The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons, for the previous 12-months [the sum of the values calculated according to B.3.i) plus B.3.k) for the previous 12-months].

n) The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons, for the previous 12-months [the sum of the values calculated according to B.3.j) plus B.3.l) for the previous 12-months].

* A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, that restrict the potential to emit of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

a) all exceedances of the rolling, 12-month emission limitation for each individual HAP;

b) all exceedances of the rolling, 12-month emission limitation for combined HAP;

c) the probable cause of each deviation (excursion);

d) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

e) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted.

Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

5. The permittee shall submit annual reports that specify the total individual HAP and combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

6. Compliance with the emission limitations in B.2 shall be determined in accordance with the following methods:

   a) Emissions Limitation:

      Individual HAP emissions from this facility shall not exceed 9.9 tons per year on a rolling 12-month basis.

      Applicable Compliance Method:

      Compliance shall be based on the record keeping specified in B.3for each individual HAP.

   b) Emissions Limitation:

      Combined HAP emissions from this facility shall not exceed 24.9 tons on a rolling, 12-month basis.

      Applicable Compliance Method:

      Compliance shall be based on the record keeping specified in B.3 for combined HAP.

C. Emissions Unit Terms and Conditions

1. K003, Adhesive Roll Coater

Operations, Property and/or Equipment Description:

adhesive paper coating process with two roll coaters with dip tanks, a flexographic printer, and drying oven, with a permanent total enclosure and regenerative thermal oxidizer (installed pre August 3, 2008)

a) 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. b)(1)f.

(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. b)(1)b, c)(1), d)(1) through d)(4), and e)(3).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 08-04850 issued 7/24/2007	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.95 pound per hour (lb/hr) and 4.15 tons per year (TPY). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(F), 3745-21-09(B)(6) and 3745-21-09(Y). See b)(2)a. through d.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid 40 CFR part 63, subpart JJJJ and Title V)	See Facility–Wide Terms and Conditions B.2. through B.6. The VOC emissions shall not exceed 4.15 tons/year,on a rolling 12-month basis.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b. through b)(2)d., c)(1), d)(1) through d)(4), d(10) and e)(3).
c.	OAC rule 3745-21-09(F)	In lieu of complying with the VOC content restriction specified by this rule, the permittee will employ a control system. See b)(2)b.
d.	OAC rule 3745-21-09(B)(6)	The VOC capture and control efficiency requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)b.
e.	OAC 3745-21-09(Y)	The VOC content requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)e.
f.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(6) through d)(9) and e)(3).

(2) Additional Terms and Conditions

a. The 0.95 pound of VOC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

b. The VOC emissions from this emissions unit shall be controlled through the application of a permanent total enclosure (PTE) to capture 100% of the emissions, and a regenerative thermal oxidizer system operating at a minimum of 95% destruction efficiency to achieve a minimum 95% overall (capture times destruction) VOC control efficiency.

(The most recent emissions testing that demonstrated compliance was conducted on June 12, 2013 with an average destruction efficiency of 98.8%.)

c. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

The PTE shall be constructed to enclose the application stations, coating reservoirs, and all areas from the application station to the oven. If the oven is operated under negative pressure, it does not need to be enclosed as long as there is no leakage between the coating application and the oven.Air flow monitor(s) or differential pressure gauge(s) shall be installed to continuously

measure and record the average facial velocity or pressure differential across the enclosure in accordance with 40 CFR Part 51, Appendix M, Method 204. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

d. The PTE shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed, installed, maintained, and operated in accordance with 40 CFR Part 51, Appendix M, Method 204, whenever the emissions unit is in operation. The permanent total enclosure shall meet all of the following criteria

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)^{0.5}$$

ii. The total area of all natural draft openings (A_N) shall not exceed 5 percent of the total surface area of the enclosure (A_T), [i.e., the four walls, floor, and ceiling]. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in (2)d., shall be completely closed to any air movement during process operations.

v. All VOC emissions shall be captured and contained for discharge through the control device.

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

c) Operational Restrictions

(1) The VOC emissions from this emissions unit shall be captured through the application of a permanent total enclosure that achieves 100 % capture and vented to a regenerative thermal oxidizer system that achieves a minimum of 95% destruction efficiency whenever the emission unit in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with applicable emission limitations/control requirements contained in this permit,the permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H2O, whenever the emissions unit is in operation.

(The most recent emissions testing that demonstrated compliance was conducted on June 12, 2013 which measured the minimum pressure differential at not less than 0.007 inch of water.).

The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

(2) In order to maintain compliance with applicable emission limitations/control requirements contained in this permit, the average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall be not more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future VOC emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(The most recent emissions testing that demonstrated compliance was conducted on June 12, 2013 with an average combustion chamber temperature of 1548 degrees Fahrenheit.).

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.

(3) The permittee shall collect and record the following information each day, when the emissions unit is in operation:

a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a 3-hour average;

b. a log or record of downtime for the capture (collection) system;

c. all three-hour blocks of time during which the combustion temperature of the thermal oxidizeris more than 50 degrees Fahrenheit below the average temperature most recent emission test that demonstrated the emissions unit was in compliance at or above the minimum; and

d. a log or record of downtime for the thermal oxidizer.

(4) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.

(5) The permittee shall collect and record the following information each month for this emission unit for the purpose of determining annual VOC emissions:

a. The name and company identification of each coating material employed;

b. The volume, in gallons, of each coating material employed;

c. The VOC content of each coating material employed, in pounds per gallon;

d. The total uncontrolled VOC usage rate (VOC input rate) for all employed [i.e., the summation of (b x c) for all materials], in tons; and

e. The total calculated controlled VOC emission rate for all coatings, in tons [i.e., (d) multiplied by a factor of (1 - the overall control efficiency), using the overall

control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance].

(6) The FEPTIO application for thisemissions unit, K003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X= 8" hours per day and "Y =7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

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

Pollutant: formaldehyde
TLV (mg/m3): 274.0
Maximum Hourly Emission Rate (lbs/hr): 0.32
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.77
MAGLC (ug/m3): 6.52

Pollutant: phenol
TLV (mg/m3): 40,753
Maximum Hourly Emission Rate (lbs/hr): 0.63
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 348.5
MAGLC (ug/m3): 970.3

The permittee, has demonstrated that emissions of formaldehyde and phenol from emissions unit K003 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

(7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level

concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(10) The permittee shall collect and record the total VOC emissions over a 12-month rolling period, in tons, [i.e., sum of the previous 12 monthly VOC emissions calculated according to d)(5)e.]for the purpose of determining compliance with the limitation specified under OAC rule 3745-31-05(D) in term b)(1).

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically

identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall submit quarterly reports that identify all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit when the emission units as in operation:

a. identification of any all 3-hour blocks of time during which the enclosure was not maintained at the minimum pressure differential of 0.013 mm Hg (0.007 inch of water), as a 3-hour average;

b. any period of times in which less than 100% of the VOC emissions were captured for discharge through the control device or the control device was bypassed;

c. identification of any period of downtime for the capture (collection) system, control device, or monitoring equipment; and

d. identification of 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 this permit;

e. the probable cause of each deviation (excursion);

f. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

g. the magnitude and duration of each deviation (excursion).

h. any exceedance of the 12-month rolling VOC emissions limitation.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submittedeach year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(4) The permittee shall submit annual reports which specify the VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the Annual Fee Emission Report.

(5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The volatile organic compound emissions from this emissions unit shall not exceed 0.95 pound per hour (lb/hr).

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage rate of 631.5 lbs/hour (i.e., resin before thinning and fillers) multiplied by the worst case coating VOC content of 3% by weight, multiplied by the overall control efficiency of (1-0.95).

b. Emission Limitation:

The volatile organic compound emissions from this emissions unit shall not exceed 4.15 tons per year.

Applicable Compliance Method:

Compliance shall be determined by the record keeping as specified in d)(5) of this permit.

c. Emission Limitation:

The VOC emissions shall not exceed 4.15 tons/year, on a 12-month rolling period.

Applicable Compliance Method:

Compliance shall be determined by the record keeping as specified in d)(10) of this permit.

(2) Formulation data shall be used to determine the HAP contents of the coating and cleanup materials.

(3) The permittee shall conduct, or have conducted, emissions compliance testing for this emissions unit in accordance with the following requirements:

a. An emissionscompliance test shall be conducted on a recurring 60 month schedule. (The last compliance testthat demonstrated compliance was conducted on June 12, 2013).

b. Emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate and overall control efficiency of 95% for organic compounds. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 18 of 40 CFR Part 60, Appendix A and Method 25 or 25A of 40 CFR Part 60, Appendix A, as appropriate, before and after the regenerative thermal oxidizer, to demonstrate compliance with the destruction efficiency for volatile organic compounds. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. A compliance demonstration for the permanent total enclosure shall be conducted to demonstrate compliance with the capture efficiency requirement. The following test method(s) shall be employed to demonstrate compliance: Method 204 of 40 CFR Part 60, Appendix A to demonstrate the permanent total enclosure can achieve 100% capture efficiency.

d. If formulation data is not available and/or if required by the regulating agency, Method 24 or 24A of 40 CFR Part 60, Appendix A shall be conducted for the organic content of the solvent materials applied. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

(4) During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through, or the pressure differential across, the natural draft openings in accordance with 40 CFR Part 51, Appendix M, Method 204. The continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration by checking the direction of air flow through the use of streamers, smoke tubes, or tracer gases at each natural draft opening. All closed access doors and windows that are not considered natural draft openings shall also be checked once during the compliance demonstration for leakage around their perimeter using smoke tubes or tracer gases.

The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening during the compliance demonstration:

a. The measured surface area of each natural draft opening;

b. The distance measured from each natural draft opening to each VOC emitting point in the process;

c. The distance measured from each exhaust duct or hood in the enclosure to each natural draft opening; and

d. The total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor, and ceiling.

(5) In accordance with 40 CFR Part 51, Appendix M, Method 204, compliance with the requirements for a permanent total enclosure shall be demonstrated if the following determinations are documented during testing:

a. The average facial velocity of the air flow into the enclosure is maintained at a minimum of 3,600 m/hr (200 feet per minute) or at a minimum pressure differential of 0.013 mm Hg (0.007 in. of water);

b. Each natural draft opening is at a distance of at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point in the process;

c. The sum of the surface areas of all of the natural draft openings in the total enclosure are not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling; calculated by dividing the total area of all natural draft openings by the total inside surface area of the enclosure;

d. There is no leakage detected at any of the closed access doors and windows, and it is certified that they always remain closed during process operations; and

e. All VOC emissions captured by the permanent total enclosure are entirely vented for discharge through the control device.

(6) The emissions and compliance demonstration testing tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or Local Air Agency 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 emissions tests shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio

EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) None.

2. P001, inline gluer machine for abrasive belts

Operations, Property and/or Equipment Description:

adhesive spray for manufacturing abrasive belts (installed pre August 3, 2008)

a) 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. b)(1)c. and c)(1).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 2008	The volatile organic compound (VOC) emissions shall not exceed 0.78 ton/month, including cleanup, averaged over a 12-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate is less than 10 tons/year taking into account the voluntary restriction from OAC rule 3745-31-05(E). See b)(2)b.

c.	OAC rule 3745-31-05(E) (voluntary restriction to limit the potential to emit and avoid BAT)	The VOCemissions shall not exceed 9.33 tons/year,including cleanup. The adhesive usage shall not exceed 3526 gallons per year.

(2) Additional Terms and Conditions

a. The Best available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

(1) The maximum adhesive usage shall not exceed 3526 gallons per year [See b)(1)c. above.]. This limitation was based upon a maximum adhesive VOC content of 5.2lbs/gallon.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification for each adhesive and cleanup material employed;

b. the number of gallons of each adhesive material employed, in gallons;

c. the number of gallons of each cleanup material employed, in gallons;

d. the VOC content of each adhesive, in pounds per gallon;

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

f. the total VOC emission rate for all adhesive and cleanup materials, in pounds per month [i.e., (b. x c.) + (d. x e.)].

g. themonthly total VOC emissions rate averaged over a 12-month rolling period, in tons, [i.e., sum of the previous 12 monthly VOC emissions calculated according to d)(1)f. divided by 12].

(2) The permittee shall maintain annual records of the total adhesive usage for this emissions unit [i.e., sum of the monthly total number of gallons of adhesive from d)(1)b. for the calendar year].

(3) The permittee shall calculate and record the total annual VOC emissions from adhesive and cleanup materials, [i.e., the sum of the monthly VOC emission rates from the adhesive and cleanup materials from d)(1)f. for the calendar year].

(4) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall submit annual reports which specify the VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the Annual Fee Emission Report.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC emissions shall not exceed 9.33 tons/year, including cleanup.

Applicable Compliance Method:

The annual emissions limitation was determined by multiplying the adhesive usage restriction (3526 gallons per year) by the maximum VOC content for the adhesive (5.2 lbs/gal) divided by 2000 lbs/ton, and then adding maximum annual emissions from cleanup materials (0.16 ton/year).

Compliance shall be based upon the record keeping requirements specified in d)(3) of this permit and shall be the summation of the monthly VOC emission rates for the calendar year .

b. Emission Limitation:

The VOC emissions shall not exceed 0.78 ton/month, including cleanup, averaged over a 12-month rolling period.

Applicable Compliance Method:

The monthly emissions limitation was the determined by dividing the annual emissions limitation of 9.33 tons/year by 12 months.

Compliance shall be based upon the record keeping requirements specified in d)(1).

c. Emission Limitation:

The maximum adhesive usage shall not exceed 3526 gallons per year.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2) of this permit and shall be the summation of the monthly adhesive usage rates for the calendar year.

(2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall use Method 24 to determine the VOC contents of the coatings. If an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24

g) Miscellaneous Requirements

(1) None.