Ohio Environmental Protection Agency

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

8/14/2015

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
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. Bill Newton
DORN COLOR, INC.
11555 BEREA RD
Cleveland, OH 44102-3522

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318000025
Permit Number: P0118967
Permit Type: Administrative Modification
County: Cuyahoga

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 Cleveland Division of Air Quality at (216)664-2297or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: CDAQ

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
DORN COLOR, INC.

Facility ID:	1318000025
Permit Number:	P0118967
Permit Type:	Administrative Modification
Issued:	8/14/2015
Effective:	8/14/2015
Expiration:	11/7/2019

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
DORN COLOR, INC.

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Authorization

Facility ID:	1318000025
Application Number(s):	A0052746
Permit Number:	P0118967
Permit Description:	FEPTIO administrative modification to replace the catalytic incinerator for emissions unit K001 (continuous paper web (lithographic) coating line) with no change in allowable emissions.
Permit Type:	Administrative Modification
Permit Fee:	$100.00
Issue Date:	8/14/2015
Effective Date:	8/14/2015
Expiration Date:	11/7/2019

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

This document constitutes issuance to:

DORN COLOR, INC.
11555 BEREA RD
Cleveland, OH 44102-3522

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0118967
Permit Description: FEPTIO administrative modification to replace the catalytic incinerator for emissions unit K001 (continuous paper web (lithographic) coating line) with no change in allowable emissions.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Coating Line #1
Superseded Permit Number:	P0115207
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) None.

C. Emissions Unit Terms and Conditions

1. K001, Coating Line #1

Operations, Property and/or Equipment Description:

Continuous Paper Web (lithographic) Coating Line with catalytic incinerator

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. d)(4)

(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)e., d)(2), d)(3), e)(4), and f)(1)c.

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) FEPTIO P0094195 issued 8/11/2011	Volatile organic compound (VOC) emissions from coating and cleanup/lacquer thinner shall not exceed 3.05 lbs/hr and 13.36 tpy. See b)(2)a. below.
b.	OAC rule 3745-21-09(F)(1)	VOC content shall not exceed 4.8 pounds per gallon of solids (controlled limit). See b)(2)b. below.
c.	OAC rule 3745-21-09(F)(2)	See b)(2)a. and c)(1) below.
d.	OAC rule 3745-21-09(B)(6)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-21-09(F)(2).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V.	Combined HAP emissions shall not exceed 9.3 tpy as a rolling, 12-month summation for all emissions units at the facility (K001 and K003). A catalytic incinerator must be employed full-time during the operation of emissions unit K001. See b)(2)a., d)(2), d)(3), and e)(4) below.
f.	OAC rule 3745-114-01	See d)(4) below.

(2) Additional Terms and Conditions

a. A control system must be employed in order to reduce VOC emissions from the paper coating line by at least ninety percent or maintain a maximum VOC outlet concentration of twenty ppmv on a dry basis, whichever is less stringent.

b. If the emissions unit is in compliance with the 90% control requirement of OAC rule 3745-21-09(F)(2), then compliance with this limit will be satisfied.

c) Operational Restrictions

(1) Unless emissions to the atmosphere are controlled by an approved emission control system with an overall control efficiency of at least ninety per cent, any person using an organic solvent for cleanup shall:

a. store all VOC containing cleaning materials and used shop towels in closed containers;

b. ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;

c. minimize spills of VOC-containing cleaning materials;

d. convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

e. minimize VOC emission from cleaning of storage, mixing, and conveying equipment.

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the VOC content of each coating, in pounds per gallon of solids (after controls, see f)(1)a.), as applied;

c. the VOC content of each coating and cleanup in lbs/gallon, as applied;

d. the amount of each coating and cleanup employed in gallons for each material;

e. the total VOC emissions, in pounds and tons (summation of c. times d. for all coatings and cleanup applied multiplied by (1 – overall control efficiency from most recent stack test)).

Note: VOC emissions shall be determined for the purpose of the Annual Fee Emissions report.

(2) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. The units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

(3) The permittee shall collect and record the following information each month:

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

b. the individual hazardous air pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);

d. the number of gallons of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);

h. the number of gallons of each cleanup material employed;

i. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (for each HAP the sum of b times d for each coating and the sum of f times h for each cleanup material multiplied by (1 – the overall control efficiency from most recent stack test)); and

j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period (the sum of c times d for each coating plus the sum of g times h for each cleanup material multiplied by (1 – the overall control efficiency from most recent stack test)).

(4) This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 13-3614. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the toluene emission limitation specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV (ug/m3): 75,362
Maximum Hourly Emission Rate (lbs/hr): 2.09
Predicted 1 Hour Maximum Ground-Level Concentration at the Fence Line (ug/m3): 273
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 1794

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 13-3614 and the operating permit:

a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emissions of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH), " than the lowest TLV value specified in the above table.

b. Any change to the emissions unit or its exhaust parameters (e.g ., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.

c. A reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC.

d. Any change to the emission unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

e. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "OC" [OAC rule 3745-21-01 (B)(6)].

f. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01(V).

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ). 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 notify the Cleveland DAQ in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days following the end of the calendar month.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. 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:

i. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;

ii. all 3-hour blocks of time (when the emissions unit was in operation during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance; and

iii. 9.3 tons total combined HAP emissions from all coatings and cleanup materials employed for K001 and K003 combined, in tons per rolling, 12-month period;

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

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

d. 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 Cleveland DAQ.

f) Testing Requirements

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

a. <u>Emission Limitation</u>:
4.8 pounds VOC per gallon of solids (after controls)

Applicable Compliance Method:
Compliance with the emission limitation shall be determined pursuant to the monitoring and record keeping. VOC content shall be determined using USEPA Method 24 of 40 CFR Part 60, Appendix A. The VOC content, in lbs/gallon of solids, shall be multiplied by (1 – the overall efficiency) based on the most recent stack test.

If the emissions unit is in compliance with the 90% control requirement of 21-09(F)(2), then compliance with this limit will be satisfied.

b. Emission Limitation:
90% overall VOC control efficiency (capture and control efficiency)

Applicable Compliance Method:
The control efficiency shall be determined in accordance with OAC rule 3745-21-10 and following the procedures of Methods 1 – 4 and 25 or 25A of 40 CFR, Part 60, Appendix A. The VOC content shall be determined using USEPA Method 24 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:
Facility-wide combined HAP emissions shall not exceed 9.3 tpy, as a rolling, 12-month summation (combined totals for K001 and K003)

Applicable Compliance Method:
Compliance with the emission limitation shall be determined pursuant to the monitoring and record keeping.

d. Emission Limitation:
3.05 lbs/hr VOC emission limit for coating application and cleanup.

Applicable Compliance Method:
Compliance shall be demonstrated by calculating the worst case hourly emissions (lbs/gal VOC coating content times maximum gallons employed times (1 – overall control efficiency from most recent stack test). Hour by hour calculations are not necessary as long as the worst case hourly calculation shows compliance.

Coating VOC = 5.75 gals/hr * 5.49 lbs VOC/gal * (1 – 0.97) = 0.95 lb VOC/hr
Clean-up VOC = 1 gal/day * 5.28 lbs VOC/gal * 1.0 * (1 – 0.97) = 0.16 lb VOC/day

e. Emission Limitation:
13.36 tpy VOC emission limit for coating application and cleanup.

Applicable Compliance Method:
The annual limitation was developed by multiplying the pound per hour limitation by the maximum operating schedule of 8,760 hours per year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

(2) If the current solvent-based coatings are still in use at the time the stack test is required; then the permittee shall conduct emission testing for this emissions unit as noted below; however, if the permittee has switched to water- based coatings, then the stack test will not be required unless the incinerator is still needed to control VOC emissions. If the stack test is needed, the permittee shall perform the stack tests in accordance with the following requirements:

a. Emission testing was conducted on K001 on July 14, 2015. Further emission testing may be required at permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of VOC in the exhaust stream, the hourly mass emission rate, and the overall control efficiency (both capture and control).

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. The control efficiency, from both inlet and outlet testing, shall be determined in accordance with OAC rule 3745-21-10 and following the procedures of Methods 1 – 4 and 25 or 25A of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

ii. 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.)

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ). Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Celveland DAQ's refusal to accept the results of the emission test(s).

f. Personnel from the Cleveland DAQ shall be permitted to witness the test(s), 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.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ 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 Cleveland DAQ.

g) Miscellaneous Requirements

(1) Emissions unit K001 was installed in December 1999and modified in July 2015.

2. K003, Hand Spray Booth

Operations, Property and/or Equipment Description:

Hand Spray Booth for coating paper material and equipped with a dry filtration system

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. 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. b)(1)d., d)(2), e)(2), and f)(1)c.

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 13-04748 issued 8/13/2008	Volatile organic compound (VOC) emissions shall not exceed 25.20 lbs/day or 4.60 tons/year (tpy).
b.	OAC rule 3745-17-07(A)	Not applicable, pursuant to OAC rule 3745-17-07(A)(3)(h).
c.	OAC rule 3745-17-11(C)	Exempt pursuant to OAC rule 3745-17-11(A)(1)(k). See b)(2)a. below.
d.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V	Combined Hazardous Air Pollutant (HAP) emissions shall not exceed9.3 tpy for all emissions units at the facility (K001 and K003).

(2) Additional Terms and Conditions

a. This emissions unit employs hand-held cup spray guns.

b. OAC rule 3745-21-07(M) does not apply because K003 does not have a control device for VOC and no baking or heat curing is utilized (coating is air dried).

a. OAC rule 3745-21-09(F) does not apply because coatings are not applied by dipping or by means of a knife, roll, or extrusion coater as defined in OAC rule 3745-21-01(D) for "paper coating".

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the coating operation:

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

b. the amount, in gallons, of each coating and cleanup material employed;

c. the VOC content of each coating and each cleanup material, in pounds per gallon;

d. the total monthly VOC emissions for all coatings and cleanup materials, the summation of (b. times c.) for each coating and cleanup material employed;

e. the total number of days the emissions unit was in operation per month; and

f. the average daily VOC emission rate for all coatings and cleanup materials, d. divided by e. in pounds per day (average).

(2) The permittee shall collect and record the following information each month:

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

b. the individual HAP content of each coating, in pounds of HAP per gallon of coating, as applied;

c. the combined HAP content of each coating, in pounds of combined HAP per gallon of coating, as applied (sum all the individual HAP contents from b);

d. the amount, in gallons, of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content of each cleanup material, in pounds of HAP per gallon of cleanup material, as applied;

g. the combined HAP content of each cleanup material, in pounds of HAP per gallon of cleanup material, as applied (sum all the individual HAP contents from f.);

h. the amount, in gallons, of each cleanup material employed;

i. the total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (for each HAP the sum of b. times d. for each coating plus the sum of f. times h. for each cleanup material); and

j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of c. times d. for each coating plus the sum of g. times h. for each cleanup material).

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. 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:

i. 9.3 tons of total combined HAP emissions from all coatings and cleanup materials employed for K001 and K003 combined, in tons per rolling, 12-month period.

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

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

d. 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 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 Cleveland Division of Air Quality (Cleveland DAQ).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland DAQ. 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.

f) Testing Requirements

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

a. Emission Limitation:
Volatile organic compound (VOC) emissions from all coatings and cleanup materials shall not exceed 25.20 lbs/day.

Applicable Compliance Method:
Compliance shall be determined by the record keeping requirements in d)(1).

b. Emission Limitation:
VOC emissions shall not exceed 4.6 tpy

Applicable Compliance Method:
Compliance with the annual allowable VOC emission rate shall be determined by summing the monthly VOC emissions determined in d)(1) for each calendar year and divide by 2000 lbs/ton.

c. Emission Limitation:
Combined HAP emissions for units K001 and K003 shall not exceed 9.3 tpy.

Applicable Compliance Method:
Compliance shall be determined by the record keeping and reporting requirements in d) (2) and e)(2).

Compliance shall also be demonstrated with the following equations:

Perform the following calculation for each coating employed:

$$\frac{gallons\ coating}{month}\ x\ \frac{lbs\ combined\ HAP}{gallon\ coating}\ x\ \frac{ton}{2000\ lbs} = \frac{tons\ combined\ HAP}{month}$$

Sum the amount of combined HAP emissions for all coatings employed during the month, then sum the monthly combined HAP emissions for each calendar year to determine the total annual combined HAP emissions.

Cleanup/Lacquer Thinner:

$$\frac{gallons\ cleanup}{month}\ x\ \frac{lbs\ combined\ HAP}{gallon\ cleanup}\ x\ \frac{ton}{2000\ lbs} = \frac{tons\ combined\ HAP}{month}$$

Sum the amount of combined HAP emissions for all cleanup materials employed during the month, then sum the monthly combined HAP emissions for each calendar year to determine the total annual combined HAP emissions.

The total annual combined HAP emissions is the sum of the HAP emissions from coatings plus the HAP emissions from cleanup materials.

(2) The VOC content of coatings shall be determined in accordance with U.S. EPA Referemce Method 24 of 40 CFR Part 60, Appendix A. The VOC content of cleanup material shall be determined from formulation data.

g) Miscellaneous Requirements

(1) Emissions unit K003 was installed in July 2004.