

Synthetic Minor Determination and/or Netting Determination

Permit To Install 14-05210

A. Source Description

Waytek Corporation coats paper, film and foil products with water-based paper coatings and hot melt adhesives for laminating. The company installed 5 new paper coating machines prior to receiving a final Permit to Install. The paper coaters are designated as emissions units K001, K002, K003, R001, and R002.

B. Facility Emissions and Attainment Status

The paper coating machines emit VOC emissions. Warren County is designated as an area of Primary Non-Attainment for ozone.

C. Source Emissions

The Potential to Emit (PTE) VOC from emissions units K001- K003 and R001/R002 exceeds the Title V Major Source threshold of 100 TPY. The Potential to Emit Hazardous Air Pollutants (HAPs) emissions does not exceed 10/25 TPY for single/total facility HAPs. This PTI restricts the VOC emissions from K001- K003 combined to 15.21 TPY, based on a rolling, 12-month summation. The PTI also restricts the VOC emissions from R001/R002 to 21.98 TPY VOC, based on a rolling, 12-month summation. Therefore, the total Synthetic Minor Potential VOC emissions from the facility due to this PTI is 37.19 TPY.

D. Conclusion

Since the Synthetic Minor Potential Emissions of VOC from all emissions units at Waytek Corp. does not exceed the Major Source threshold of 100 TPY, the facility may avoid the Part 70 Title V permit requirements and the Emissions Offset Policy by maintaining Synthetic Minor Status. The company will maintain monthly coating usage records and VOC content records to determine compliance with the permit limits. The company will determine compliance based on rolling, 12-month summation of the VOC emissions.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
WARREN COUNTY
Application No: 14-05210**

CERTIFIED MAIL

DATE: 6/27/2002

Waytek Corporation
Ram Mukkamala
400 Shotwell Drive
Franklin, OH 45005-0000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

HCDES

OH-KY-IN Regional Council of Gov.

KY

IN



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-05210

Application Number: 14-05210
APS Premise Number: 1483040431
Permit Fee: **To be entered upon final issuance**
Name of Facility: Waytek Corporation
Person to Contact: Ram Mukkamala
Address: 400 Shotwell Drive
Franklin, OH 45005-0000

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

**400 Shotwell Drive
Franklin, Ohio**

Description of proposed emissions unit(s):

Installation of five paper, film and foil coater/laminators.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

Waytek Corporation

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lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	37.19

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Blue Coater - 38 inch Mayer Rod continuous web coater with infrared electric oven	OAC rule 3745-31-05(A)(3)	111.4 lbs VOC/day
	OAC rule 3745-31-05(D) Synthetic Minor to Avoid the Emission Offset Policy and Title V	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and OAC rule 3745-31-05(D). The maximum annual VOC emissions from emissions units K001, K002, and K003 combined shall not exceed 15.21 TPY based on a rolling, 12-month summation.
	OAC rule 3745-21-09(F)	See T&C A.2.c 2.9 lbs VOC/gallon of coating, excluding water and exempt solvents (based on a daily volume weighted average).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the daily volume weighted average VOC content limit, compliance with the daily VOC

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Emissions Unit ID: **K001**

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emissions limit, compliance with the annual combined VOC emissions limit (K001 through K003), and compliance with the Ohio EPA Air Toxics Policy.

Emissions Unit ID: **K001**

- 2.b** The daily VOC emission limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with the VOC emissions limit.
- 2.c** The VOC emissions from emissions units K001, K002, and K003 combined shall not exceed 15.21 TPY tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Months	<u>Maximum Allowable Cumulative VOC Emissions (Tons)</u>
1	1.27
1-2	2.54
1-3	3.80
1-4	5.07
1-5	6.34
1-6	7.61
1-7	8.87
1-8	10.14
1-9	11.41
1-10	12.68
1-11	13.94
1-12	15.21

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information on a daily basis:
 - a. the name and identification number of each coating, as applied;

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- b. the VOC content, excluding water and exempt solvents, in pounds per gallon of coating for each coating, as applied;
 - c. the number of gallons, excluding water and exempt solvents, of each coating, employed; and
 - d. the daily volume-weighted average VOC content, as applied, for all coatings. The daily volume weighted average shall be calculated by multiplying the VOC content in line (b) by the usage amount contained in line (c) for all coatings employed during that day. The summation of these values should then be divided by the total gallons of coatings employed during that day.
2. The permittee shall collect and record the following information on a monthly basis:
- a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon for each coating and cleanup material as applied;
 - c. the number of gallons, excluding water and exempt solvents, of each coating and cleanup material, employed;
 - d. the actual VOC emissions (E_d) from emissions units K001, K002 and K003 combined, calculated in accordance with the following equation:

$$E_d = V_1C_1 + V_2C_2 + \dots + V_nC_n$$

where:

E_d = actual pounds of VOC emissions for the month from emissions units K001, K002 and K003.

C = VOC content of each coating and/or cleanup material employed in emissions units K001, K002 and K003 in pounds of VOC per gallon of coating or cleanup material, excluding water and exempt solvents.

V = volume of each coating and/or cleanup material employed for the month in emissions units K001, K002 and K003 in gallons, excluding water and exempt solvents.

1,2 = subscript denoting a specific coating or cleanup material employed.

n = total number of surface coatings and/or cleanup materials employed in emissions

Way

PTI

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

units K001, K002 and K003

- e. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC emissions from emissions units K001, K002 and K003 combined, in tons, for each calendar month; and
 - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the updated rolling, 12-month summation of the VOC emissions from emissions units K001, K002 and K003 combined, in tons.
3. The permit to install for the merged emissions from emissions units K001 - K003, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: triethylamine

TLV (ug/m3): 4138.6

Maximum Hourly Emission Rate (lbs/hr): 1.13 (K001 - K003 combined)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 86.76 (K001 - K003 combined)

MAGLC (ug/m3): 98.5

Physical changes to or in the method of operation of the emissions units after installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

Emissions Unit ID: **K001**

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission 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 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions units or their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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4. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions units will satisfy the Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions units still satisfy the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services (HCDES) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation in term A.1. The notification shall include a copy of such record and shall be sent to the HCDES within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all exceedances of the rolling, 12-month VOC emissions limitation and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emissions levels. The permittee shall submit these reports to the Hamilton County Department of Environmental Services. If no exceedances occurred during the reporting period, the permittee shall state so in the report. Pursuant to General Term and Condition A.1.c.ii., the permittee shall submit these reports by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year.

E. Testing Requirements

Waytek Corporation
PTI Application 14-05310
Issue

Facility ID: 1483040431

Emissions Unit ID: K001

1. Emissions Limitation

111.4 lbs VOC/day

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Emissions Unit ID: **K001**

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Compliance with the daily VOC emissions limitation in section A.1. shall be demonstrated by multiplying the actual total daily coating usage (gallons/day, as applied) by the actual daily volume-weighted average VOC content (lbs. VOC/gallon, as applied) to yield daily emissions in lbs. VOC/day.

2. Emissions Limitation

15.21 TPY VOC; K001, K002 and K003 combined

Compliance with the annual combined VOC emissions limitation for emissions units K001, K002 and K003 shall be demonstrated by the recordkeeping requirement in section C.2.f.

3. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., C.1., C.2., D. and E.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Tan Coater - 42 inch Mayer Rod continuous web coater with infrared electric oven	OAC rule 3745-31-05(A)(3)	123.2 lbs VOC/day
	OAC rule 3745-31-05(D) Synthetic Minor to Avoid the Emissions Offset Policy and Title V	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and OAC rule 3745-31-05(D).
	OAC rule 3745-21-09(F)	The maximum annual VOC emissions from emissions units K001, K002, and K003 combined shall not exceed 15.21 TPY based on a rolling, 12-month summation. See T&C A.2.c 2.9 lbs VOC/gallon of coating, excluding water and exempt solvents (based on a daily volume weighted average).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with

Way

PTI

Emissions Unit ID: **K002**

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the daily volume weighted average VOC content limit, compliance with the daily VOC emissions limit, compliance with the annual combined VOC emissions limit (K001 through K003), and compliance with the Ohio EPA Air Toxics Policy.

Way

PTI

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

- 2.b** The daily VOC emission limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with the VOC emissions limit.
- 2.c** The VOC emissions from emissions units K001, K002, and K003 combined shall not exceed 15.21 TPY tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Months	<u>Maximum Allowable</u> <u>Cumulative VOC Emissions (Tons)</u>
1	1.27
1-2	2.54
1-3	3.80
1-4	5.07
1-5	6.34
1-6	7.61
1-7	8.87
1-8	10.14
1-9	11.41
1-10	12.68
1-11	13.94
1-12	15.21

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information on a daily basis:

- a. the name and identification number of each coating, as applied;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon of coating for each coating, as applied;
 - c. the number of gallons, excluding water and exempt solvents, of each coating, employed; and
 - d. the daily volume-weighted average VOC content, as applied, for all coatings. The daily volume weighted average shall be calculated by multiplying the VOC content in line (b) by the usage amount contained in line (c) for all coatings employed during that day. The summation of these values should then be divided by the total gallons of coatings employed during that day.
2. The permittee shall collect and record the following information on a monthly basis:
- a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon for each coating and cleanup material as applied;
 - c. the number of gallons, excluding water and exempt solvents, of each coating and cleanup material, as employed;
 - d. the actual VOC emissions (E_d) from emissions units K001, K002 and K003 combined, calculated in accordance with the following equation:

$$E_d = V_1C_1 + V_2C_2 + \dots + V_nC_n$$

where:

E_d = actual pounds of VOC emissions for the month from emissions units K001, K002 and K003.

C = VOC content of each coating and/or cleanup material employed in emissions units K001, K002 and K003 in pounds of VOC per gallon of coating or cleanup material, excluding water and exempt solvents.

V = volume of each coating and/or cleanup material employed for the month in emissions units K001, K002 and K003 in gallons, excluding water and exempt solvents.

1,2 = subscript denoting a specific coating or cleanup material employed.

Way

PTI

Emissions Unit ID: **K002**

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- n = total number of surface coatings and/or cleanup materials employed in emissions units K001, K002 and K003
- e. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC emissions from emissions units K001, K002 and K003 combined, in tons, for each calendar month; and
 - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the updated rolling, 12-month summation of the VOC emissions from emissions units K001, K002 and K003 combined, in tons.
3. The permit to install for the merged emissions from emissions units K001 - K003, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: triethylamine

TLV (ug/m3): 4138.6

Maximum Hourly Emission Rate (lbs/hr): 1.13 (K001 - K003 combined)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 86.76 (K001 - K003 combined)

MAGLC (ug/m3): 98.5

Physical changes to or in the method of operation of the emissions units after installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission 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 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions units or their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

Way

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Emissions Unit ID: **K002**

1. Emissions Limitation

123.2 lbs VOC/day

Way

PTI

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

Compliance with the daily VOC emissions limitation in section A.1. shall be demonstrated by multiplying the actual total daily coating usage (gallons/day, as applied) by the actual daily volume-weighted average VOC content (lbs. VOC/gallon, as applied) to yield daily emissions in lbs. VOC/day.

2. Emissions Limitation

15.21 TPY VOC; K001, K002 and K003 combined

Compliance with the annual combined VOC emissions limitation for emissions units K001, K002 and K003 shall be demonstrated by the recordkeeping requirement in section C.2.f.

3. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., C.1., C.2., D. and E.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Green Coater - 57 inch Mayer Rod continuous web coater with gas fired flashoff oven	OAC rule 3745-31-05(A)(3)	166.3 lbs VOC/day
	OAC rule 3745-31-05(D) Synthetic Minor to Avoid the Emission Offset Policy and Title V	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and OAC rule 3745-31-05(D).
	OAC rule 3745-21-09(F)	The maximum annual VOC emissions from emissions units K001, K002, and K003 combined shall not exceed 15.21 TPY based on a rolling, 12-month summation. See T&C A.2.c. 2.9 lbs VOC/gallon of coating, excluding water and exempt solvents (based on a daily volume weighted average).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the daily volume weighted average VOC content limit, compliance with the daily VOC

Way

PTI

Emissions Unit ID: **K003**

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emissions limit, compliance with the annual combined VOC emissions limit (K001 through K003), and compliance with the Ohio EPA Air Toxics Policy.

Way

PTI

Emissions Unit ID: **K003**

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- 2.b** The daily VOC emission limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with the VOC emissions limit.
- 2.c** The VOC emissions from emissions units K001, K002, and K003 combined shall not exceed 15.21 TPY tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Months	<u>Maximum Allowable</u> <u>Cumulative VOC Emissions (Tons)</u>
1	1.27
1-2	2.54
1-3	3.80
1-4	5.07
1-5	6.34
1-6	7.61
1-7	8.87
1-8	10.14
1-9	11.41
1-10	12.68
1-11	13.94
1-12	15.21

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information on a daily basis:

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- a. the name and identification number of each coating, as applied;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon of coating for each coating, as applied;
 - c. the number of gallons, excluding water and exempt solvents, of each coating, employed; and
 - d. the daily volume-weighted average VOC content, as applied, for all coatings. The daily volume weighted average shall be calculated by multiplying the VOC content in line (b) by the usage amount contained in line (c) for all coatings employed during that day. The summation of these values should then be divided by the total gallons of coatings employed during that day.
2. The permittee shall collect and record the following information on a monthly basis:
- a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon for each coating and cleanup material as applied;
 - c. the number of gallons, excluding water and exempt solvents, of each coating and cleanup material, employed;
 - d. the actual VOC emissions (E_d) from emissions units K001, K002 and K003 combined, calculated in accordance with the following equation:

$$E_d = V_1C_1 + V_2C_2 + \dots + V_nC_n$$

where:

E_d = actual pounds of VOC emissions for the month from emissions units K001, K002 and K003.

C = VOC content of each coating and/or cleanup material employed in emissions units K001, K002 and K003 in pounds of VOC per gallon of coating or cleanup material, excluding water and exempt solvents.

V = volume of each coating and/or cleanup material employed for the month in emissions units K001, K002 and K003 in gallons, excluding water and exempt solvents.

Emissions Unit ID: **K003**

- 1,2 = subscript denoting a specific coating or cleanup material employed.
n = total number of surface coatings and/or cleanup materials employed in emissions units K001, K002 and K003
- e. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC emissions from emissions units K001, K002 and K003 combined, in tons, for each calendar month; and
 - f. beginning after the first 12 calendar months of operation following the issuance of this permit, the updated rolling, 12-month summation of the VOC emissions from emissions units K001, K002 and K003 combined, in tons.
3. The permit to install for the merged emissions from emissions units K001 - K003, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: triethylamine

TLV (ug/m3): 4138.6

Maximum Hourly Emission Rate (lbs/hr): 1.13 (K001 - K003 combined)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 86.76 (K001 - K003 combined)

MAGLC (ug/m3): 98.5

Physical changes to or in the method of operation of the emissions units after installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

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PTI

Emissions Unit ID: **K003**

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- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission 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 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions units or their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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4. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions units will satisfy the Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions units still satisfy the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services (HCDES) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation in term A.1. The notification shall include a copy of such record and shall be sent to the HCDES within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all exceedances of the rolling, 12-month VOC emissions limitation and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emissions levels. The permittee shall submit these reports to the Hamilton County Department of Environmental Services. If no exceedances occurred during the reporting period, the permittee shall state so in the report. Pursuant to General Term and Condition A.1.c.ii., the permittee shall submit these reports by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year.

E. Testing Requirements

Waytek Corporation
PTI Application 14-05310
Issue

Facility ID: 1483040431

Emissions Unit ID: K003

1. Emissions Limitation

166.3 lbs VOC/day

Way

PTI

Emissions Unit ID: **K003**

Issued: To be entered upon final issuance

Compliance with the daily VOC emissions limitation in section A.1. shall be demonstrated by multiplying the actual total daily coating usage (gallons/day, as applied) by the actual daily volume-weighted average VOC content (lbs. VOC/gallon, as applied) to yield daily emissions in lbs. VOC/day.

2. Emissions Limitation

15.21 TPY VOC; K001, K002 and K003 combined

Compliance with the annual combined VOC emissions limitation for emissions units K001, K002 and K003 shall be demonstrated by the recordkeeping requirement in section C.2.f.

3. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., C.1., C.2., D. and E.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Bi-laminate coater - 72 inch J/W Tips continuous web coater with immersion grid baking oven	OAC rule 3745-31-05(A)(3)	100.3 lbs VOC/day 1.6 lbs VOC/gallon of coating, excluding water and exempt solvents (based on a daily volume weighted average). The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D) Synthetic Minor to Avoid the Emissions Offset Policy and Title V	The maximum annual VOC emissions from emissions units R001 and R002 combined shall not exceed 21.98 TPY based on a rolling, 12-month summation.
		See T&C A.2.c

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the daily volume weighted average VOC content limit, compliance with the daily VOC emissions limit and compliance with the annual combined VOC emissions limit (R001 and R002).

- 2.b** The daily VOC emissions limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with the VOC emissions limit.
- 2.c** The emissions of VOC from emissions units R001 and R002 combined shall not exceed 21.98 TPY tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Months	<u>Maximum Allowable</u> <u>Cumulative VOC Emissions (Tons)</u>
1	1.83
1-2	3.66
1-3	5.50
1-4	7.33
1-5	9.16
1-6	10.99
1-7	12.82
1-8	14.65
1-9	16.49
1-10	18.32
1-11	20.15
1-12	21.98

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. The use of photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Recordkeeping Requirements

Issued: To be entered upon final issuance

1. The permittee shall collect and record the following information on a daily basis:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon of coating for each coating, as applied;
 - c. the number of gallons, excluding water and exempt solvents, of each coating, employed;
 - d. the daily volume-weighted average VOC content, as applied, for all coatings. The daily volume weighted average shall be calculated by multiplying the VOC content in line (b) by the usage amount contained in line (c) for all coatings employed during that day. The summation of these values should then be divided by the total gallons of coatings employed during that day; and
 - e. a record of each liquid organic material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

2. The permittee shall collect and record the following information on a monthly basis:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content, excluding water and exempt solvents, in pounds per gallon for each coating and cleanup material, as applied;
 - c. the number of gallons, excluding water and exempt solvents, of each coating and cleanup material, employed;
 - d. the actual VOC emissions (E_d) from emissions units R001 and R002 combined, calculated in accordance with the following equation:

$$E_d = V_1C_1 + V_2C_2 + \dots + V_nC_n$$

where:

E_d = actual pounds of VOC emissions for the month from emissions units R001 and R002.

C = VOC content of each coating and/or cleanup material employed in emissions units R001 and R002 in pounds of VOC per gallon of coating or cleanup material,

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Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

excluding water and exempt solvents.

V = volume of each coating and/or cleanup material employed for the month in emissions units R001 and R002 in gallons, excluding water and exempt solvents.

1,2 = subscript denoting a specific coating or cleanup material employed.

n = total number of surface coatings and/or cleanup materials employed in emissions units R001 and R002

- e. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC emissions from emissions units R001 and R002 combined, in tons, for each calendar month; and
- f. beginning after the first 12 calendar months of operation following the issuance of this permit, the updated rolling, 12-month summation of the VOC emissions from emissions units R001 and R002 combined, in tons.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services (HCDES) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation in term A.1. The notification shall include a copy of such record and shall be sent to the HCDES within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly reports which identify all exceedances of the rolling, 12-month VOC emissions limitation and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC emissions levels. The permittee shall submit these reports to the Hamilton County Department of Environmental Services. If no exceedances occurred during the reporting period, the permittee shall state so in the report. Pursuant to General Term and Condition A.1.c.ii., the permittee shall submit these reports by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of

Environmental Services within 45 days after the exceedance occurs.

E. Testing Requirements

1. Emissions Limitation

100.3 lbs VOC/day

Compliance with the daily VOC emissions limitation in section A.1. shall be demonstrated by multiplying the actual total daily coating usage (gallons/day, as applied) by the actual daily volume-weighted average VOC content (lbs. VOC/gallon, as applied) to yield daily emissions in lbs. VOC/day.

2. Emissions Limitation

21.98 TPY VOC; R001 and R002 combined

Compliance with the annual combined VOC emissions limitation for emissions units R001 and R002 shall be demonstrated by the recordkeeping requirement in section C.2.f.

3. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the inks and coatings.

4. Compliance with the limitation in term B.1. shall be demonstrated by the record keeping in term C.1.e.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. The following terms and conditions of this permit are federally enforceable: A., B., C., D. and E.

Way

PTI

Emissions Unit ID: **R002**

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- 2.b** The daily VOC emissions limitation outlined in section A.1. is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with the VOC emissions limit.

- 2.c** The emissions of VOC from emissions units R001 and R002 combined shall not exceed 21.98 TPY tons per year, based upon a rolling, 12-month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Months	<u>Maximum Allowable</u> <u>Cumulative VOC Emissions (Tons)</u>
1	1.83
1-2	3.66
1-3	5.50
1-4	7.33
1-5	9.16
1-6	10.99
1-7	12.82
1-8	14.65
1-9	16.49
1-10	18.32
1-11	20.15
1-12	21.98

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. The use of photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information on a daily basis:

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Emissions Unit ID: **R002**

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- a. the name and identification number of each coating, as applied;
- b. the VOC content, excluding water and exempt solvents, in pounds per gallon of coating for each coating, as applied;
- c. the number of gallons, excluding water and exempt solvents, of each coating, employed;

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- d. the daily volume-weighted average VOC content, as applied, for all coatings. The daily volume weighted average shall be calculated by multiplying the VOC content in line (b) by the usage amount contained in line (c) for all coatings employed during that day. The summation of these values should then be divided by the total gallons of coatings employed during that day; and
- e. a record of each liquid organic material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

2. The permittee shall collect and record the following information on a monthly basis:

- a. the name and identification number of each coating and cleanup material, as applied;
- b. the VOC content, excluding water and exempt solvents, in pounds per gallon for each coating and cleanup material, as applied;
- c. the number of gallons, excluding water and exempt solvents, of each coating and cleanup material, employed;
- d. the actual VOC emissions (E_d) from emissions units R001 and R002 combined, calculated in accordance with the following equation:

$$E_d = V_1C_1 + V_2C_2 + \dots + V_nC_n$$

where:

E_d = actual pounds of VOC emissions for the month from emissions units R001 and R002.

C = VOC content of each coating and/or cleanup material employed in emissions units R001 and R002 in pounds of VOC per gallon of coating or cleanup material, excluding water and exempt solvents.

V = volume of each coating and/or cleanup material employed for the month in emissions units R001 and R002 in gallons, excluding water and exempt solvents.

1,2 = subscript denoting a specific coating or cleanup material employed.

n = total number of surface coatings and/or cleanup materials employed in emissions units R001 and R002

- e. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative VOC emissions from emissions units R001 and R002

Way

PTI

Emissions Unit ID: **R002**

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volume-weighted average VOC content (lbs. VOC/gallon, as applied) to yield daily emissions in lbs. VOC/day.

2. Emissions Limitation

21.98 TPY VOC; R001 and R002 combined

Compliance with the annual combined VOC emissions limitation for emissions units R001 and R002 shall be demonstrated by the recordkeeping requirement in section C.2.f.

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PTI

Emissions Unit ID: **R002**

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3. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the inks and coatings.
4. Compliance with the limitation in term B.1. shall be demonstrated by the record keeping in term C.1.e.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The following terms and conditions of this permit are federally enforceable: A., B., C., D. and E.