Ohio Environmental Protection Agency

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

10/2/2015

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: 3M Medina
Facility ID: 1652050059
Permit Type: Minor Permit Modification
Permit Number: P0119207

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically 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 U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Akron Regional Air Quality Management District

# PROPOSED

# Division of Air Pollution Control
# Title V Permit
for
3M Medina

| | |
|---|---|
| Facility ID: | 1652050059 |
| Permit Number: | P0119207 |
| Permit Type: | Minor Permit Modification |
| Issued: | 10/2/2015 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
3M Medina

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# Authorization

| | |
|---|---|
| Facility ID: | 1652050059 |
| Facility Description: | Paper, Coated and Laminated: NEC. |
| Application Number(s): | A0052611 |
| Permit Number: | P0119207 |
| Permit Description: | Title V Minor Permit Modification to clarify in the VOC emission limitations for K005 that hand cleaning is not done in an enclosure that is vented to the thermal oxidizer. |
| Permit Type: | Minor Permit Modification |
| Issue Date: | 10/2/2015 |
| Effective Date: | To be entered upon final issuance |
| Expiration Date: | To be entered upon final issuance |
| Superseded Permit Number: | P0112402 |

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

3M Medina
1030 Lake Road
Medina, OH 44256

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

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Akron Regional Air Quality Management District. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

## *2.* Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Akron Regional Air Quality Management District. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Akron Regional Air Quality Management District by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of

federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Akron Regional Air Quality Management District unless otherwise specified.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. General Requirements**

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## 8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## 9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Akron Regional Air Quality Management District concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Akron Regional Air Quality Management District) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Akron Regional Air Quality Management District with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Akron Regional Air Quality Management District as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

## 16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## 17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## 18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11)))*

**24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theAkron Regional Air Quality Management District.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Akron Regional Air Quality Management District. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

**25. Records Retention RequirementsUnder State Law Only**

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.

**26. 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 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.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

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 Akron Regional Air Quality Management District 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).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Akron Regional Air Quality Management District must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

## 30. Submitting Documents Required by this Permit

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

# B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ: K001, K002, K003, K004 and K005. The complete NESHAP requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Akron Regional Air Quality Management District (ARAQMD).

3. The following emissions unit contained in this permit is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD: B002. The complete NESHAP requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Akron Regional Air Quality Management District (ARAQMD).

4. The permittee shall comply with the emission limitations, work practice standards and operating limits required under 40 CFR Part 63, Subpart DDDDD, including the following sections and Table:

| Section/Table: | Requirement: |
|---|---|
| 63.7500(a)(1) | You must meet each emission limitation and work practice standard in Tables 1 through 3 and 11 through 13 that applies to your boiler or process heater |
| Table 3 | Work Practice Standards |
| 63.7500(a)(3) | At all times, you must operate and maintain any affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. |
| 63.7500(e) | Boilers and process heaters must complete a tune-up every 5 years as specified in §63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13, or the operating limits. |
| 63.7505(a) | You must be in compliance with the emission limits, work practice standards, and operating limits in this subpart. These limits apply to you at all times the affected unit is operating except for the periods noted in §63.7500(f). |

5. The permittee shall comply with the initial compliance requirements and subsequent tune-ups required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.7510(e) | You must complete an initial tune-up by following the procedures described in §63.7540(a)(10)(i) through (vi) no later than the compliance date specified in §63.7495. You must complete the one-time energy assessment specified in Table 3 to this subpart no later than the compliance date specified in §63.7495. |

| | |
|---|---|
| 63.7515(d) | You must conduct a 5-year performance tune-up according to §63.7540(a)(12). Each 5-year tune-up specified in §63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up. |

6. The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.7540(a)(12) | You must conduct a tune-up of the boiler or process heater every 5 years as specified in §63.7450(a)(10)(i) through (vi) to demonstrate continuous compliance. You may delay the burner inspection specified in §63.7450(a)(10)(i) until the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months. |
| 63.7450(a)(13) | If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. |
| 63.7555(a) | You must keep records according to paragraphs (a)(1) and (2) of §63.7555. |
| 63.7555(h) | You must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies. |
| 63.7560(a) | Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). |
| 63.7560(b) | As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. |
| 63.7560(c) | You must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records off site for the remaining 3 years. |

7. The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections and Table:

| Section/Table: | Requirement: |
|---|---|
| 63.7495(d) | You must meet the notification requirements in §63.7545 according to the schedule in §63.7545 and in subpart A of 40 CFR Part 63. Some of the notifications must be submitted before you are required to comply with the emission limits and work practice standards in this subpart. |
| 63.7530(d) | If you own or operate an existing unit with a heat input capacity of less than 10 million Btu per hour or a unit in the unit designed to burn gas 1 subcategory, you must submit a signed statement in the Notification of Compliance Status report that |

| | |
|---|---|
| | indicates that you conducted a tune-up of the unit. |
| 63.7530(e) | You must include with the Notification of Compliance Status a signed certification that the energy assessment was completed according to Table 3 and is an accurate depiction of your facility at the time of the assessment. |
| 63.7530(f) | You must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in §63.7545(e). |
| 63.7545(a) | You must submit to the Administrator all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply to you by the dates specified. |
| 63.7545(b) | You must submit an Initial Notification not later than May 31, 2013. |
| 63.7545(e) | You must submit a Notification of Compliance Status according to §63.9(h)(2)(ii). |
| 63.7545(f) | You must submit a notification of alternative fuel use within 48 hours of the declaration of each period of natural gas curtailment or supply interruption, as defined in §63.7575. |
| 63.7545(h) | You must provide notice of the date upon which you switched fuels or made the physical change within 30 days of the switch/change. |
| 63.7550(a) | You must submit each report in Table 9 to this subpart that applies to you. |
| Table 9 | You must comply with the following requirements for reports. |
| 63.7550(b) | Schedule for submission of compliance reports |
| 63.7550(c)(1) | If the facility is subject to the requirements of a tune up, they must submit a compliance report with the information in paragraphs (c)(5)(i) through (iv) and (xiv) of §63.7550. |
| 63.7550(h) | You must submit the reports according to the procedures specified §63.7550(h)(1) through (3). |

8. The permittee shall comply with the applicable miscellaneous requirements and information required under 40 CFR Part 63, Subpart DDDDD, including the following sections and Table:

| Section/Table: | Requirement: |
|---|---|
| 63.7495(b) | If you have an existing boiler or process heater, you must comply with this subpart no later than January 31, 2016, except as provided in §63.6(i). |
| 63.7565 | Table 10 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you. |
| Table 10 | Applicability of General Provisions to Subpart DDDDD |
| 63.7570 | Who implements and enforces this subpart? |
| 63.7575 | Definitions that apply to this subpart |

9. The following emissions unit contained in this permit is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ: B001. The complete NESHAP requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Akron Regional Air Quality Management District (ARAQMD).

10. The permittee shall comply with the applicable emission limitations and other requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections and Tables:

| Section/Table: | Requirement: |
|---|---|
| 63.6602 | You must comply with the emission limitations and other requirements in Table 2c to this subpart which apply to you. |
| Table 2c | You must meet the following requirement, except during periods of startup:<br>a. Change oil and filter every 500 hours of operation or annually, whichever comes first;<br>b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;<br>c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. |
| 63.6640(a) | You must demonstrate continuous compliance according to methods specified in Table 6 to this subpart. |
| Table 6 | You must demonstrate continuous compliance by:<br>a. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or<br>b. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. |

11. The permittee shall comply with the applicable general requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.6605(a) | You must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to you at all times. |
| 63.6605(b) | At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance |

procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

12. The permittee shall comply with the applicable installation, collection, operation, maintenance, monitoring and recordkeeping requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.6625(e) | You must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan. |
| 63.6625(f) | You must install a non-resettable hour meter if one is not already installed. |
| 63.6625(h) | You must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. |
| 63.6625(j) | You have the option of utilizing an oil analysis. |
| 63.6640(f) | You must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of §63.6640. |
| 63.6655(a) | You must keep the records described in paragraphs (a)(1) through (a)(5) of §63.6655. |
| 63.6655(d) | You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you. |
| 63.6655(e) | You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan. |
| 63.6655(f) | You must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. |
| 63.6660(a) | Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). |
| 63.6660(b) | As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. |
| 63.6660(c) | You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). |

13. The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections and Table:

| Section/Table: | Requirement: |
|---|---|
| 63.6640(b) | You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. |
| 63.6640(e) | You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you. |
| 63.6640(a) | You must submit each report in Table 7 of this subpart that applies to you. |
| Table 7 | Requirements for Reports |
| 63.6640(h) | If you own or operate an emergency stationary RICE with a site rating of more than 100 brake HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in §63.6640(f)(4)(ii), you must submit an annual report according to the requirements in paragraphs (h)(1) through (3) of §63.6640. |

14. The permittee shall comply with the applicable general and miscellaneous requirements under 40 CFR Part 63, Subpart ZZZZ, including the following sections and Table:

| Section/Table: | Requirement: |
|---|---|
| 63.6595 | You must comply with the applicable emission limitations, operating limitations, and other requirements no later than October 19, 2013 |
| 63.6665 | Table 8 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you. |
| Table 8 | Applicability of General Provisions to Subpart ZZZZ |
| 63.6670 | Who implements and enforces this subpart? |
| 63.6675 | Definitions that apply to this subpart |

15. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

| | |
|---|---|
| B001 | 60 kilowatt Cummins power generation model GGHE-5627558 emergency electric generator |
| B002 | Burnham boiler for steam for rehydration for K005 |

[Authority for term: OAC rule 3745-77-07(A)(13)]

# C. Emissions Unit Terms and Conditions

## 1. K001, Vinyl Top-Coating Line

**Operations, Property and/or Equipment Description:**

vinyl coating line with an attached drying oven, controlled by a thermal oxidizer - Vinyl Top-Coating Line.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-21-09(H)(2) | The vinyl coating line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC), as determined under paragraph (C) of rule 3745-21-10 of the Administrative Code:<br><br>The capture efficiency shall at least be 75%, by weight; and<br><br>The control efficiency which shall at least be 90%, by weight. |
| b. | OAC rule 3745-21-09(F)(2)(a)(i) | The paper coating line shall employ a control system in order to reduce VOC emissions from the paper coating line by at least 90%. |
| c. | OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(F) | The capture and control equipment shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment shall have an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment. |
| d. | OAC rule 3745-21-09(F)(2)(b) | See c)(1) below. |
| e. | 40 CFR Part 63, Subpart JJJJ | You must limit organic hazardous air |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | pollutant (HAP) emissions to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources.<br><br>See b)(2)a. below.<br><br>[Authority for term: 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ] |
| f. | 40 CFR Part 64 | Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit.<br><br>The VOC emission limitations in OAC rule 3745-21-09(H)(2) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with §§63.3321(b), 63.3350, 63.3400(c), and 63.3410 of 40 CFR Part 63, Subpart JJJJ. |
| g. | 40 CFR Part 63, Subpart A | Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in §§63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.<br><br>[Authority for term: §63.3340 of 40 CFR Part 63, Subpart JJJJ] |

(2) Additional Terms and Conditions

a. You must demonstrate compliance with 40 CFR Part 63, Subpart JJJJ by following the procedures in §63.3370.

[Authority for term: §63.3320(c) of 40 CFR Part 63, Subpart JJJJ]

c) Operational Restrictions

(1) Work practice standards for cleaning materials.

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.

[Authority for term: OAC rule 3745-21-09(F)(2)(b)]

(2) All of the VOC emissions from this emissions unit shall be vented to the thermal oxidizer when the emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable operating limits required under 40 CFR Part 63, Subpart JJJJ, including the following section(s) and Table(s):

| Section/Table: | Requirement: |
|---|---|
| 63.3321(a) | You must meet the operating limits specified in Table 1 at all times after you establish them. |
| Table 1 | Operating Limits for Add-On Control Devices and Capture Systems |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, in any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, must not fall below 1500 degrees Fahrenheit or below the combustion temperature limit established according to §63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1) and Table 1 to Subpart JJJJ of 40 CFR Part 63]

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the

desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1500 degrees Fahrenheit or fell below the combustion temperature limit established according to §63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]

(3) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.3350(a) | Summary of monitoring you must do |
| 63.3350(b) | You must monitor and inspect each capture system and each control device used to comply with §63.3320. You must install and operate the monitoring equipment as specified. |
| 63.3350(c) | Bypass and coating use monitoring – monitor bypass of the control device and the mass of each coating material applied during any such bypass. |
| 63.3350(e) | Continuous parameter monitoring system (CPSM) - Install, operate and maintain each CPMS specified in paragraphs (e)(9) and (10) and (f) of this section according to the requirements in paragraphs (e)(1) through (8) of this section excluding the calibration requirement in paragraph (e)(9)(i) as described in d)(5) below. |
| 63.3350(f) | Capture system monitoring – You must develop a site-specific monitoring plan and monitor the capture system as specified in this section. Any deviation from the operating parameter value or range of values is considered a deviation from the operating limit. The monitoring plan must be updated at least annually. |
| 63.3410(a) | Records that must be maintained on a monthly basis. |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(5) 3M Medina shall comply with the alternative comparative monitoring procedure approved by U.S. EPA on June 29, 2011 as an alternative to the calibration verification specified in §63.3550(e)(9)(i) of 40 CFR Part 63, Subpart JJJJ. The alternative comparative monitoring procedure specifies that on a quarterly basis the programmable logic control receiving temperature data from the thermal oxidizer must be evaluated for compliance with the Paper and Other Web Coating NESHAP. The four thermocouple readings within the chambers of the thermal oxidizer must be compared once per minute for ten minutes and deemed consistent in each set to within 50 ˚F. If the readings differ more than 50 ˚F, the permittee shall promptly investigate the cause of the deviation.

[Authority for term: §63.3350(e)(10) of 40 CFR Part 63, Subpart JJJJ]

(6) The permittee shall comply with the requirements for showing compliance required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.3370(a) | Summary of how you must demonstrate compliance.<br><br>The facility will comply via one of the following compliance options: §63.3370(e), (f) or (g). |
| 63.3370(e) | Capture and control to reduce emissions to no more than allowable limit |
| 63.3370(e)(1) | If the affected source has only always-controlled work stations and operates more than one capture system or more than one control device, you must demonstrate compliance in accordance with the provision of either paragraph (n) or (p) of this section. |
| 63.3370(k) | Oxidizer compliance demonstration procedures. |
| 63.3370(k)(1) | Demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters. |
| 63.3370(k)(1)(i) | Determine the oxidizer destruction efficiency using procedures in §63.3360(e). |
| 63.3370(k)(1)(ii) | Determine the capture system capture efficiency in accordance with §63.3360(f). |
| 63.3370(k)(1)(iii) | Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with §63.3360(e) and (f) to ensure capture and control efficiency. |
| 63.3370(k)(2)(i) | If demonstrating compliance with §63.3320(b)(1) via §63.3370(p), calculate the overall organic HAP control efficiency achieved using Equation 11 of this section. |

63.3370(n) Combinations of capture and control. Calculate organic HAP emissions according to the procedures in paragraphs (n)(1) through (4) of this section, and use the calculation procedures specified in paragraph (n)(5) of this section to convert the monitoring and other data into units of the selected control option in paragraphs (e) through (h) of this section. Use the procedures specified in paragraph (n)(6) of this section to demonstrate compliance.

63.3370(p) You are in compliance with the emissions standard in §63.3320(b)(1) for the month if the overall organic HAP control efficiency as determined by paragraphs (k)(1)(i) through (iii) and (k)(2)(i) of this section for each web coating line or group of web coating lines served by that control device and a common capture system is at least 95 percent.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

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

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1500 degrees Fahrenheit or fell below the combustion temperature limit established according to §63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;

c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit(s) was/were in operation and the VOC emissions were not vented to the thermal oxidizer. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

| Section/Table: | Requirement: |
|---|---|
| 63.3400(a) | You must submit the reports specified in paragraphs (b) through (g) of this section. |
| 63.3400(b) | Initial Notification |
| 63.3400(c) | Semiannual compliance reports |
| 63.3400(d) | Notification of Performance Tests |
| 63.3400(e) | Notification of Compliance Status |
| 63.3400(f) | Performance Test Reports |
| 63.3400(g) | Startup, shutdown, and malfunction reports as specified in §63.10(d)(5) |
| Table 1 | Submit monitoring plan to the Administrator that identifies operating parameters to be monitored according to §63.3350(f). |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

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

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.

c. 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 U.S. EPA'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 control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present

and their total concentration, and on a consideration of the potential presence of interfering gases.

e. 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 appropriate Ohio EPA District Office or local air agency. 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.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

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

[Authority for term: OAC rule 3745-21-10(C) and OAC rule 3745-77-07(C)(1)]

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

a. Emission Limitation:

The capture efficiency for VOC emissions shall, at least, be 75%, by weight

Applicable Compliance Method:

Compliance with the allowable VOC capture efficiency limitation above shall be demonstrated based upon emission testing in accordance with the requirements specified in f)(1) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

The control efficiency for VOC emissions from vinyl coating shall, at least, be 90%, by weight.

The paper coating line shall employ a control system in order to reduce VOC emissions from the paper coating line by at least 90%.

Applicable Compliance Method:

Compliance with the allowable VOC control efficiency limitations above shall be demonstrated based upon emission testing in accordance with the requirements specified in f)(1) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

The capture and control equipment shall provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment shall have an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment.

Applicable Compliance Method:

Compliance with the allowable control efficiency and overall control efficiency limitations for VOC above shall be demonstrated based upon emission testing in accordance with the requirements specified in f)(1) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

You must limit organic HAP emissions to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitation above shall be demonstrated through the monitoring and record keeping requirements in d)(4) and d)(5) above and through requirements for showing compliance in d)(6) above.

If required, the permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

| Section: | Requirement: |
|---|---|
| 63.3360(a)(2) | Performance test methods you must conduct |
| 63.3360(e) | Control device efficiency performance testing |
| 63.3360(e)(1) | Methods and procedures specified for initial performance test |
| 63.3360(e)(2) | Process information required that you must record during the performance test |
| 63.3360(e)(3) | Establishing operating limit during the performance test |
| 63.3360(f) | Capture efficiency performance testing |
| 63.3360(f)(1) | Permanent total enclosure demonstration |
| 63.3360(f)(2) | Determining capture efficiency according to the protocols for testing with temporary total enclosures |
| 63.3360(f)(3) | You may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in appendix A of 40 CFR Part 63, Subpart KK. |

The initial performance test was conducted on March 28-29, 2006. An additional performance test was conducted on June 5-6, 2013 to establish a new minimum temperature limit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

## 2. K002, Emulsion Coater 1

**Operations, Property and/or Equipment Description:**

reverse roll emulsion coating line with attached drying oven - Emulsion Coater #1

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | 40 CFR Part 60, Subpart RR | See b)(2)a. below. |
| b. | OAC rule 3745-21-09(F)(1) | No owner or operator of a paper coating line may cause, allow or permit the discharge into the ambient air of any volatile organic compounds (VOC) in excess of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| c. | OAC rule 3745-21-09(F)(2) | Coatings applied in the paper coating line shall not exceed 0.067 pound of VOC per pound of coating.<br><br>See c)(1) below. |
| d. | 40 CFR Part 63, Subpart JJJJ | You must limit organic hazardous air pollutant (HAP) emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.<br><br>See b)(2)b. below.<br><br>[Authority for term: §63.3320(b)(2) & (b)(3) of 40 CFR Part 63, Subpart JJJJ] |
| e. | 40 CFR Part 63, Subpart A | Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | parts of the General Provisions in §§63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.<br><br>[Authority for term: §63.3340 of 40 CFR Part 63, Subpart JJJJ] |

(2) Additional Terms and Conditions

a. Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to §60.442(a) and all other sections of 40 CFR Part 60, Subpart RR.

[Authority for term: §60.440(b) of 40 CFR Part 60, Subpart RR]

b. You must demonstrate compliance with 40 CFR Part 63, Subpart JJJJ by following the procedures in §63.3370.

[Authority for term: §63.3320(c) of 40 CFR Part 63, Subpart JJJJ]

c) Operational Restrictions

(1) Work practice standards for cleaning materials.

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.

[Authority for term: OAC rule 3745-21-09(F)(2)(b)]

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 employed, as applied; and

b. the VOC content of each coating employed (excluding water and exempt solvents) in pound(s) per gallon, as applied; and

c. the VOC content of each coating employed, in pound(s) of VOC per pound of coating, as applied;

[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]

(2) The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in §40.446(a) of 40 CFR Part 60, Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: §60.445(a) of 40 CFR Part 60, Subpart RR]

(3) The owner or operator of an affected facility operating at the conditions specified in §60.440(b) of 40 CFR Part 60, Subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

[Authority for term: §60.445(d) of 40 CFR Part 60, Subpart RR]

(4) Records of the measurements required in d)(2) through d)(3) above must be retained for at least two years following the date of the measurements.

[Authority for term: §60.445(h) of 40 CFR Part 60, Subpart RR]

(5) The permittee shall comply with the applicable monitoring and record keeping requirements and the applicable requirements for showing compliance required under 40 CFR Part 63, Subpart JJJJ, including, but not limited to, the following sections:

| Section: | Requirement: |
|---|---|
| 63.3360(a) | The performance test methods you must conduct |
| 63.3360(c) | Organic HAP content |
| 63.3360(d) | Volatile organic and coating solids content |
| 63.3370(a) | Requirements for showing compliance |
| 63.3370(a)(1) | Use of “as-purchased” compliant coating materials |
| 63.3370(a)(2) | Use of “as-applied” compliant coating materials |

| | |
|---|---|
| 63.3370(b) | Demonstration of compliance using only as-purchased "compliant" coating materials. |
| 63.3370(c) | Demonstration of compliance using only as applied "compliant" coating materials using one of the procedures in this section. |
| 63.3410(a) | Records that must be maintained on a monthly basis. |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.3400(a) | You must submit the reports specified in paragraphs (b) through (g) of this section. |
| 63.3400(b) | Initial Notification |
| 63.3400(c) | Semiannual compliance reports |
| 63.3400(e) | Notification of Compliance Status |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

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

a. Emission Limitation:

No owner or operator of a paper coating line may cause, allow or permit the discharge into the ambient air of any VOC in excess of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be based upon the record keeping requirements established in d)(1) above. In accordance with OAC rule 3745-21-04(B)(5), 3M Medina, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, has determined that Method 24 cannot be used accurately to determine the VOC content of the coatings used at the facility. In lieu of U.S. EPA Method 24, 3M Medina shall determine the VOC contents of the coatings using formulation data as approved by the U.S. EPA on September 17, 2004.

[Authority for term: OAC rule 3745-21-10(B) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Coatings applied in the paper coating line shall not exceed 0.067 pound of VOC per pound of coating.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be based upon the record keeping requirements established in d)(1) above. In accordance with OAC rule 3745-21-04(B)(5), 3M Medina, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, has determined that Method 24 cannot be used accurately to determine the VOC content of the coatings used at the facility. In lieu of U.S. EPA Method 24, 3M Medina shall determine the VOC contents of the coatings using formulation data as approved by the U.S. EPA on September 17, 2004.

[Authority for term: OAC rule 3745-21-10(B) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in d)(2) and d)(3) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or

no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitations above shall be demonstrated through the monitoring and record keeping requirements in d)(5) and as described in §63.3370 of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

**3. K003, Emulsion Coater 2**

**Operations, Property and/or Equipment Description:**

roll coater with drying oven and laminating station - Emulsion Coater # 2.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 16-02375) | 65.0 pounds of organic compounds (OC) per hour for coatings<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F), OAC rule 3745-31-05(D), 40 CFR Part 60, Subpart RR and 40 CFR Part 63, Subpart JJJJ. |
| b. | OAC rule 3745-31-05(D)<br>(to avoid being a major modification under the nonattainment provisions listed in Chapter 3745-31) | The annual OC input rate* and the annual OC emissions each shall not exceed 32.6 tons of OC per rolling, 12-month summation (from coatings and cleanup materials) (see b)(2)b. below).<br><br>*Annual coatings and cleanup materials usage is based upon a OC input rate that is equivalent to the annual OC emission rates and is based upon the following: OC input rate = (C) x (D) where C = the number of gallons of each coating and cleanup material employed and D = the OC content of each coating and clean up material employed in pounds of OC per gallon of coating and clean up material where 100% of the solvents in the coating and clean up materials employed is emitted. |
| c. | OAC rule 3745-21-09(F)(1) | No owner or operator of a paper coating line may cause, allow or permit the |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | discharge into the ambient air of any volatile organic compounds (VOC) in excess of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| d. | OAC rule 3745-21-09(F)(2) | Coatings applied in the paper coating line shall not exceed 0.067 pound of VOC per pound of coating.<br><br>See c)(1) below. |
| e. | 40 CFR Part 60, Subpart RR | See b)(2)c. below. |
| f. | 40 CFR Part 63, Subpart JJJJ | You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.<br><br>See b)(2)d. below.<br><br>[Authority for term: §63.3320(b)(2) & (b)(3) of 40 CFR Part 63, Subpart JJJJ] |
| g. | 40 CFR Part 63, Subpart A | Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in §§63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.<br><br>[Authority for term: §63.3340 of 40 CFR Part 63, Subpart JJJJ] |

(2) Additional Terms and Conditions

a. The hourly allowable OC emission limitation was established for Permit to Install (PTI) purposes to reflect the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with this emission limitation.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the PTI or a new final PTI prior to the change(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Both the annual combined coating and cleanup material usage OC input rate* and the annual emissions of OC from this emissions unit shall not exceed 32.6 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates and OC emissions, respectively. The permittee has existing coating and cleanup material usage OC input* records and therefore does not need to be limited to first year monthly coating and cleanup material usage OC input* amounts.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to §60.442(a) and all other sections of 40 CFR Part 60, Subpart RR.

[Authority for term: §60.440(b) of 40 CFR Part 60, Subpart RR]

d. You must demonstrate compliance with 40 CFR Part 63, Subpart JJJJ by following the procedures in §63.3370.

[Authority for term: §63.3320(c) of 40 CFR Part 63, Subpart JJJJ]

c) Operational Restrictions

(1) Work practice standards for cleaning materials.

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.

[Authority for term: OAC rule 3745-21-09(F)(2)(b)]

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 employed, as applied;

b. the VOC content of each coating employed (excluding water and exempt solvents), in pound(s) per gallon, as applied;

c. the VOC content of each coating employed, in pound(s) of VOC per pound of coating, as applied;

d. the OC content of each coating employed, in pounds per gallon or weight fraction, as applied;

e. the number of gallons or pounds of each coating employed;

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

g. the OC content of each cleanup material employed, in pound(s) per gallon or weight fraction;

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

i. the total OC input amounts* and the total OC emissions, in tons, from all the coatings and cleanup materials employed; and

j. the rolling, 12-month OC input rate* and the rolling, 12-month OC emissions, in tons, from all the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(2) The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in §40.446(a) of 40 CFR Part 60, Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: §60.445(a) of 40 CFR Part 60, Subpart RR]

(3) The owner or operator of an affected facility operating at the conditions specified in §60.440(b) of 40 CFR Part 60, Subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

[Authority for term: §60.445(d) of 40 CFR Part 60, Subpart RR]

(4) Records of the measurements required in d)(2) and d)(3) above must be retained for at least two years following the date of the measurements.

[Authority for term: §60.445(h) of 40 CFR Part 60, Subpart RR]

(5) The permittee shall comply with the applicable monitoring and record keeping requirements and the applicable requirements for showing compliance required under 40 CFR Part 63, Subpart JJJJ, including, but not limited to, the following sections:

| Section: | Requirement: |
|---|---|
| 63.3360(a) | The performance test methods you must conduct |
| 63.3360(c) | Organic HAP content |
| 63.3360(d) | Volatile organic and coating solids content |
| 63.3370(a) | Requirements for showing compliance |
| 63.3370(a)(1) | Use of "as-purchased" compliant coating materials |
| 63.3370(a)(2) | Use of "as-applied" compliant coating materials |
| 63.3370(b) | Demonstration of compliance using only as-purchased "compliant" coating materials. |
| 63.3370(c) | Demonstration of compliance using only as applied "compliant" coating materials using one of the procedures in this section. |
| 63.3410(a) | Records that must be maintained on a monthly basis. |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of both the rolling, 12-month OC emission limitation of 32.6 tons (from coatings and cleanup materials usages) and the rolling, 12-month OC input rate of 32.6 tons (from coatings and cleanup materials usages).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(5) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.3400(a) | You must submit the reports specified in paragraphs (b) through (g) of this section. |
| 63.3400(b) | Initial Notification |
| 63.3400(c) | Semiannual compliance reports |
| 63.3400(e) | Notification of Compliance Status |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

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

a. Emission Limitation:

65.0 pounds of OC per hour for coatings

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above was established by multiplying the maximum pounds of coatings applied per hour by the maximum OC weight fraction of all the coatings.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The annual OC input rate* and the annual OC emissions each shall not exceed 32.6 tons of OC per rolling, 12-month summation (from coatings and cleanup materials)

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitations above shall be demonstrated in accordance with the monthly record keeping requirements established in d)(1) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

No owner or operator of a paper coating line may cause, allow or permit the discharge into the ambient air of any VOC in excess of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be based upon the record keeping requirements established in d)(1) above. In accordance with OAC rule 3745-21-04(B)(5), 3M Medina, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, has determined that Method 24 cannot be used accurately to determine the VOC content of the coatings used at the facility. In lieu of U.S. EPA Method 24, 3M Medina shall determine the VOC contents of the coatings using formulation data as approved by the U.S. EPA on September 17, 2004.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Coatings applied in the paper coating line shall not exceed 0.067 pound of VOC per pound of coating.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be based upon the record keeping requirements established in d)(1) above. In accordance with OAC rule 3745-21-04(B)(5), 3M Medina, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, has determined that Method 24 cannot be used accurately to determine the VOC content of the coatings used at the facility. In lieu of U.S. EPA Method 24, 3M Medina shall determine the VOC contents of the coatings using formulation data as approved by the U.S. EPA on September 17, 2004.

[Authority for term: OAC rule 3745-21-10(B) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a),

however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in d)(2) and d)(3) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitations:

You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitations above shall be demonstrated through the monitoring and record keeping requirements in d)(5) and as described in §63.3370 of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

**4. K004, Emulsion Coater 3**

**Operations, Property and/or Equipment Description:**

reverse roll coater with drying oven - Emulsion Coater 3.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(7), d)(8) and d)(9).

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)<br>(PTI 16-02229) | 0.899 pound of organic compounds (OC) per gallon of coating, as applied after final formulation, excluding water<br><br>40.01 tons per year of OC from coatings and cleanup materials<br><br>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, subpart RR. |
| b. | OAC rule 3745-21-09(F)(1) | No owner or operator of a paper coating line may cause, allow or permit the discharge into the ambient air of any volatile organic compounds (VOC) in excess of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| c. | OAC rule 3745-21-09(F)(2) | Coatings applied in the paper coating line shall not exceed 0.067 pound of VOC per pound of coating.<br><br>See c)(1) below. |
| d. | 40 CFR Part 60, Subpart RR | See b)(2)a. below. |
| e. | 40 CFR Part 63, Subpart JJJJ | You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | existing affected sources.<br><br>See b)(2)b. below.<br><br>[Authority for term: §63.3320(b)(2) & (b)(3) of 40 CFR Part 63, Subpart JJJJ] |
| f. | 40 CFR Part 63, Subpart A | Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in §§63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.<br><br>[Authority for term: §63.3340 of 40 CFR Part 63, Subpart JJJJ] |

(2) Additional Terms and Conditions

a. Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to §60.442(a) and all other sections of 40 CFR Part 60, Subpart RR.

[Authority for term: §60.440(b) of 40 CFR Part 60, Subpart RR]

b. You must demonstrate compliance with 40 CFR Part 63, Subpart JJJJ by following the procedures in §63.3370.

[Authority for term: §63.3320(c) of 40 CFR Part 63, Subpart JJJJ]

c) Operational Restrictions

(1) Work practice standards for cleaning materials.

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.

[Authority for term: OAC rule 3745-21-09(F)(2)(b)]

(2) The permittee shall burn only natural gas as fuel in the drying oven for this emissions unit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification of each coating employed;

b. the OC content of each coating employed, in pound(s) per gallon, as applied after final formulation, excluding water (i.e., $\frac{\text{lbs OC}}{\text{gal coating minus water}}$);

c. the VOC content of each coating employed (excluding water and exempt solvents) in pound(s) per gallon, as applied; and

d. the VOC content of each coating employed, in pound(s) of VOC per pound of coating, as applied.

[Note: For the purposes of this section, formulation data may be used to determine the OC content of each coating employed.]

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in §40.446(a) of 40 CFR Part 60, Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: §60.445(a) of 40 CFR Part 60, Subpart RR]

(3) The owner or operator of an affected facility operating at the conditions specified in §60.440(b) of 40 CFR Part 60, Subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

[Authority for term: §60.445(d) of 40 CFR Part 60, Subpart RR]

(4) Records of the measurements required in d)(2) and d)(3) above must be retained for at least two years following the date of the measurements.

[Authority for term: §60.445(h) of 40 CFR Part 60, Subpart RR]

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

a. the name and identification of each coating and cleanup material employed;

b. the OC content of each coating and cleanup material, in pound(s) per gallon or weight fraction;

c. the number of gallons or pounds of each coating and cleanup material employed; and

d. the total OC emissions from all coatings and cleanup materials employed, in tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall comply with the applicable monitoring and record keeping requirements and the applicable requirements for showing compliance required under 40 CFR Part 63, Subpart JJJJ, including, but not limited to, the following sections:

| Section: | Requirement: |
|---|---|
| 63.3360(a) | The performance test methods you must conduct |
| 63.3360(c) | Organic HAP content |
| 63.3360(d) | Volatile organic and coating solids content |
| 63.3370(a) | Requirements for showing compliance |
| 63.3370(a)(1) | Use of “as-purchased” compliant coating materials |
| 63.3370(a)(2) | Use of “as-applied” compliant coating materials |
| 63.3370(b) | Demonstration of compliance using only as-purchased “compliant” coating materials. |
| 63.3370(c) | Demonstration of compliance using only as applied “compliant” coating materials using one of the procedures in this section. |
| 63.3410(a) | Records that must be maintained on a monthly basis. |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(7) The permit to install (PTI) #16-02229 for this emissions unit was evaluated based on the actual coatings and cleanup materials employed, and the design parameters of the

emissions unit's exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the PTI 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl acetate (CAS 141-78-6)

TLV (ug/m3): 1,440,000

Maximum Hourly Emission Rate (lbs/hr): 22.5

Predicted 1-Hour Maximum Ground-Level Concentration at 139 m (ug/m3): 2106
MAGLC (ug/m3): 34,286

(8) Physical changes to or changes in the method of operation of the emissions unit after its 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 Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

a. changes in the composition of the materials used (process materials and 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 unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(QQQ)(1)(a)(ii), and a modification of the existing PTI will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (QQQ)(1)(a)(ii)), then the permittee shall obtain a final PTI prior to the change.

(9) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 unit still satisfies the "Air Toxics Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.3400(a) | You must submit the reports specified in paragraphs (b) through (g) of this section. |
| 63.3400(b) | Initial Notification |
| 63.3400(c) | Semiannual compliance reports |
| 63.3400(e) | Notification of Compliance Status |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

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

a. Emission Limitation:

0.899 pound of OC per gallon of coating, as applied after final formulation, excluding water

Applicable Compliance Method:

Compliance with the allowable OC emission limitation above shall be demonstrated based upon the record keeping requirements established in d)(1) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

No owner or operator of a paper coating line may cause, allow or permit the discharge into the ambient air of any VOC in excess of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be based upon the record keeping requirements established in d)(1) above. In accordance with OAC rule 3745-21-04(B)(5), 3M Medina, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, has determined that Method 24 cannot be used accurately to determine the VOC content of the coatings used at the facility. In lieu of U.S. EPA Method 24, 3M Medina shall determine the VOC contents of the coatings using formulation data as approved by the U.S. EPA on September 17, 2004.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

Coatings applied in the paper coating line shall not exceed 0.067 pound of VOC per pound of coating.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be based upon the record keeping requirements established in d)(1) above. In accordance with OAC rule 3745-21-04(B)(5), 3M Medina, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, has determined that Method 24 cannot be used accurately to determine the VOC content of the coatings used at the facility. In

lieu of U.S. EPA Method 24, 3M Medina shall determine the VOC contents of the coatings using formulation data as approved by the U.S. EPA on September 17, 2004.

[Authority for term: OAC rule 3745-21-10(B) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

40.01 tons per year of OC from coatings and cleanup materials

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated based upon the record keeping requirements established in d)(5) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of §60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in d)(2) and d)(3) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitations:

You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitations above shall be demonstrated through the monitoring and record keeping requirements in d)(6) and as described in §63.3370 of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

**5. K005, Solvent Coater**

**Operations, Property and/or Equipment Description:**

pressure sensitive tape and label adhesives applied to continuous web paper and film substrates dried with a natural gas-fired direct heat transfer oven - Solvent Coater.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 16-02263) | 51.4 pounds per hour (lbs/hr) of volatile organic compounds (VOC) emissions from coatings (thermal oxidizer stack emissions) & 112.57 tons per year (tpy) of VOC emissions from coatings and cleanup materials;<br><br>96% overall VOC emission reduction, by weight;<br><br>Note: All VOC emissions are considered to be organic HAP emissions.<br><br>0.1 lb/hr& 0.4 tpy of particulate emissions (PE) (thermal oxidizer stack emissions);<br><br>13.2 lbs/hr& 57.8 tpy of nitrogen oxides ($NO_x$) emissions (thermal oxidizer stack emissions);<br><br>8.26 lbs/hr& 36.2 tpy of carbon monoxide (CO) emissions (thermal oxidizer stack emissions); and<br><br>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart JJJJ. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| b. | 40 CFR Part 63, Subpart JJJJ | You must limit organic hazardous air pollutant (HAP) emissions to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) or no more than 4 percent of the mass of coating materials applied for each month or no more than 20 percent of the mass of coating solids applied for each month.<br><br>See b)(2)c. below.<br><br>[Authority for term: 63.3320(b)(1), (2) and (3) of 40 CFR Part 63, Subpart JJJJ] |
| c. | OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(F) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| d. | OAC rule 3745-21-09(F)(2)(a)(i) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| e. | OAC rule 3745-21-09(F)(2)(b) | See c)(1) below. |
| f. | 40 CFR Part 60, Subpart RR | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| g. | 40 CFR Part 64 | Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit.<br><br>The VOC emission limitations in OAC rule 3745-31-05(A)(3) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with §§63.3321(b), 63.3350, 63.3400(c), and 63.3410 of 40 CFR Part 63, Subpart JJJJ. |
| h. | 40 CFR Part 63, Subpart A | Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in §§63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.<br>[Authority for term: §63.3340 of 40 CFR Part 63, Subpart JJJJ] |

(2) Additional Terms and Conditions

a. The hourly VOC, PM, NOx, and CO emission limitations were established for Permit to Install (PTI) purposes to reflect the emissions unit's potentials to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increase(s) the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the PTI or a new final PTI prior to the change(s).

b. The permittee shall properly install, adjust, operate, and maintain, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), a thermal oxidizer and associated control equipment as necessary to adequately capture, contain, vent, and destroy air emissions of VOCs and HAPs from this emissions unit as required by this permit and to the extent possible with good engineering design and practice.

c. You must demonstrate compliance with 40 CFR Part 63, Subpart JJJJ by following the procedures in §63.3370.

[Authority for term: §63.3320(c) of 40 CFR Part 63, Subpart JJJJ]

c) Operational Restrictions

(1) Work practice standards for cleaning materials.

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.

[Authority for term: OAC rule 3745-21-09(F)(2)(b)]

(2) The thermal oxidizer with all associated control equipment serving this emissions unit shall be in operation at all times the emissions unit is in operation and coating raw materials. If the thermal oxidizer or any of its associated control equipment malfunctions or must be shut down for any reason, the emissions unit shall immediately cease coating until effective repairs are made. Once coating has ceased, the line may continue operating until the coated material is through the oven. Normal operation does not include oven startup before coating begins.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(3) The emissions unit, vented to the thermal oxidizer as required in normal operation, shall only vent directly to ambient air (e.g., through a bypass stack) during emergency conditions as detected by Lower Explosive Level (LEL) instrumentation and the direct venting to ambient air shall only occur until the emissions unit safely ceases coating raw material. The emissions unit shall remain shut down until the reason for the LEL emergency condition has been effectively identified and corrected and the emissions unit can resume normal operations, venting to the thermal oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall store all waste materials in closed containers with tightly fitted covers.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(5) The permittee shall comply with the applicable operating limits required under 40 CFR Part 63, Subpart JJJJ, including the following section(s) and Table(s):

| Section/Table: | Requirement: |
|---|---|
| 63.3321(a) | You must meet the operating limits specified in Table 1 at all times after you establish them. |
| Table 1 | Operating Limits for Add-On Control Devices and Capture Systems |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall document all times the thermal oxidizer and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, in any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, must not fall below 1500 degrees Fahrenheit or below the

combustion temperature limit established according to §63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1) and Table 1 to Subpart JJJJ of 40 CFR Part 63]

(3) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1500 degrees Fahrenheit or fell below the combustion temperature limit established according to §63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]

(4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

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

b. the VOC content of each coating employed, as applied, in pound(s) per gallon;

c. the number of gallons of each coating employed;

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

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

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

g. the total VOC emissions from all cleanup materials employed [summation of (e x f) for all cleanup materials], in pounds or tons;

h. the total uncontrolled VOC emissions from all coatings employed [summation of (b x c) for all coatings], in pounds or tons;

i. the calculated, controlled VOC emission rate for all the coatings, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

j. the total VOC emission rate for all the coatings and cleanup materials (g + i), in pounds or tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.3350(a) | Summary of monitoring you must do |
| 63.3350(b) | You must monitor and inspect each capture system and each control device used to comply with §63.3320. You must install and operate the monitoring equipment as specified. |
| 63.3350(c) | Bypass and coating use monitoring – monitor bypass of the control device and the mass of each coating material applied during any such bypass. |
| 63.3350(e) | Continuous parameter monitoring system (CPSM) - Install, operate and maintain each CPMS specified in paragraphs (e)(9) and (10) and (f) of this section according to the requirements in paragraphs (e)(1) through (8) of this section excluding the calibration requirement in paragraph (e)(9)(i) as described in d)(5) below. |
| 63.3350(f) | Capture system monitoring – You must develop a site-specific monitoring plan and monitor the capture system as specified in this section. Any deviation from the operating parameter value or range of values is considered a deviation from the operating limit. The monitoring plan must be updated at least annually. |
| 63.3410(a) | Records that must be maintained on a monthly basis. |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(7) 3M Medina shall comply with the alternative comparative monitoring procedure approved by U.S. EPA on June 29, 2011 as an alternative to the calibration verification specified in §63.3550(e)(9)(i) of 40 CFR Part 63, Subpart JJJJ. The alternative comparative monitoring procedure specifies that on a quarterly basis the programmable logic control receiving temperature data from the thermal oxidizer must be evaluated for compliance with the Paper and Other Web Coating NESHAP. The four thermocouple readings within the chambers of the thermal oxidizer must be compared once per minute for ten minutes and deemed consistent in each set to within 50 ˚F. If the readings differ more than 50 ˚F, the permittee shall promptly investigate the cause of the deviation.

[Authority for term: §63.3350(e)(10) of 40 CFR Part 63, Subpart JJJJ]

(8) The permittee shall comply with the requirements for showing compliance required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

| Section: | Requirement: |
|---|---|
| 63.3370(a) | Summary of how you must demonstrate compliance.<br><br>The facility will comply via one of the following compliance options: §63.3370(e), (f) or (g). |
| 63.3370(e) | Capture and control to reduce emissions to no more than allowable limit |
| 63.3370(e)(1) | If the affected source has only always-controlled work stations and operates more than one capture system or more than one control device, you must demonstrate compliance in accordance with the provision of either paragraph (n) or (p) of this section. |
| 63.3370(k) | Oxidizer compliance demonstration procedures. |
| 63.3370(k)(1) | Demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters. |
| 63.3370(k)(1)(i) | Determine the oxidizer destruction efficiency using procedures in §63.3360(e). |
| 63.3370(k)(1)(ii) | Determine the capture system capture efficiency in accordance with §63.3360(f). |
| 63.3370(k)(1)(iii) | Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with §63.3360(e) and (f) to ensure capture and control efficiency. |
| 63.3370(k)(2)(i) | If demonstrating compliance with §63.3320(b)(1) via §63.3370(p), calculate the overall organic HAP control efficiency achieved using Equation 11 of this section. |
| 63.3370(n) | Combinations of capture and control. Calculate organic HAP emissions according to the procedures in paragraphs (n)(1) through (4) of this section, and use the calculation procedures specified in paragraph (n)(5) of this section to convert the monitoring and other data into units of the selected control option in paragraphs (e) through (h) of this section. Use the procedures specified in paragraph (n)(6) of this section to demonstrate compliance. |
| 63.3370(p) | You are in compliance with the emissions standard in §63.3320(b)(1) for the month if the overall organic HAP control efficiency as determined by paragraphs (k)(1)(i) through (iii) and (k)(2)(i) of this section for each web coating line or group of web |

coating lines served by that control device and a common capture system is at least 95 percent.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records:

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

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1500 degrees Fahrenheit or fell below the combustion temperature limit established according to §63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;

c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit deviation (excursion) reports that identify any time periods when the thermal oxidizer and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

| Section/Table: | Requirement: |
|---|---|
| 63.3400(a) | You must submit the reports specified in paragraphs (b) through (g) of this section. |
| 63.3400(b) | Initial Notification |
| 63.3400(c) | Semiannual compliance reports |
| 63.3400(d) | Notification of Performance Tests |
| 63.3400(e) | Notification of Compliance Status |
| 63.3400(f) | Performance Test Reports |
| 63.3400(g) | Startup, shutdown, and malfunction reports as specified in §63.10(d)(5) |
| Table 1 | Submit monitoring plan to the Administrator that identifies operating parameters to be monitored according to §63.3350(f). |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

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

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the 96% overall VOC emission reduction requirement.

[Note: Compliance with the 95% overall HAP emission reduction requirement is assumed if the permittee demonstrates compliance with the 96% overall VOC emission reduction requirement.]

c. 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 U.S. EPA'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 control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected

shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

e. 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 appropriate Ohio EPA District Office or local air agency. 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.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

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

[Authority for term: OAC rule 3745-21-10(C) and OAC rule 3745-77-07(C)(1)]

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

a. Emission Limitations:

0.1 lb/hr& 0.4 tpy of PE (thermal oxidizer stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above based on the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A, or other U.S. EPA-approved test methods.

As long as compliance with the hourly allowable PE limitation is maintained, compliance with the annual allowable PE limitation above shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

51.4 lbs/hr of VOC emissions from coatings (thermal oxidizer stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above based on the results of emission testing conducted in accordance with Methods 1-4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A, or other U.S. EPA-approved test methods.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

112.57 tpy of VOC emissions from coatings and cleanup materials

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in d)(5) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

96% overall VOC emission reduction, by weight

Applicable Compliance Method:

Compliance with the allowable VOC overall control efficiency above shall be based on the results of emission testing conducted in accordance with the methods as outlined in f)(1) above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

13.2 lbs/hr& 57.8 tpy of $NO_x$ emissions (thermal oxidizer stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable $NO_x$ emission limitation above based on the results of emission testing conducted in accordance with Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A, or other U.S. EPA-approved test methods.

As long as compliance with the hourly allowable $NO_x$ emission limitation is maintained, compliance with the annual allowable $NO_x$ emission limitation above shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitations:

8.26 lbs/hr& 36.2 tpy of CO emissions (thermal oxidizer stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A, or other U.S. EPA-approved test methods.

As long as compliance with the hourly allowable CO emission limitation is maintained, compliance with the annual allowable CO emission limitation above shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g. Emission Limitation:

You must limit organic HAP emissions to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) or no more than 4 percent of the mass of coating materials applied for each month or no more than 20 percent of the mass of coating solids applied for each month.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitation above shall be demonstrated through the monitoring and record keeping requirements in d)(6) and d)(7) above and through requirements for showing compliance in d)(8) above.

If required, the permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

| Section: | Requirement: |
|---|---|
| 63.3360(a)(2) | Performance test methods you must conduct |
| 63.3360(e) | Control device efficiency performance testing |
| 63.3360(e)(1) | Methods and procedures specified for initial performance test |
| 63.3360(e)(2) | Process information required that you must record during the performance test |
| 63.3360(e)(3) | Establishing operating limit during the performance test |
| 63.3360(f) | Capture efficiency performance testing |
| 63.3360(f)(1) | Permanent total enclosure demonstration |
| 63.3360(f)(2) | Determining capture efficiency according to the protocols for testing with temporary total enclosures |
| 63.3360(f)(3) | You may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in appendix A of 40 CFR Part 63, Subpart KK. |

The initial performance test was conducted on March 28-29, 2006. An additional performance test was conducted on June 5-6, 2013 to establish a new minimum temperature limit.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None

## 6. L001, Die Cleaning Station

**Operations, Property and/or Equipment Description:**

cold solvent cleaning of metal coating die - Die Cleaning Station.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 16-02263) | 4 tons per year of volatile organic compounds (VOC) emissions.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O). |
| b. | OAC rule 3745-21-09(O) | See b)(2)a. through b)(2)d. below. |

(2) Additional Terms and Conditions

a. The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.

[Authority for term: OAC rule 3745-21-09(O)(2)(a)(i), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

b. The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

[Authority for term: OAC rule 3745-21-09(O)(2)(b), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

c. The cold cleaner shall be maintained with a freeboard ratio equal to or greater than 0.7.

[Authority for term: OAC rule 3745-21-09(O)(2)(c)(i), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

d. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

i. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.

ii. Store waste solvent in covered containers.

iii. Close the cover whenever parts are not being handled in the cleaner.

iv. Drain the cleaned parts until dripping ceases.

v. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.

vi. Clean only materials that are neither porous nor absorbent.

[Authority for term: OAC rule 3745-21-09(O)(2)(d), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

e. The solvent material employed in the cold cleaner shall have a vapor pressure that does not exceed 1.0 mm Hg (0.019 psi) measured at twenty degrees Celsius (sixty-eight degrees Fahrenheit).

[Authority for term: OAC rule 3745-21-09(O)(2)(e)(i) and OAC rule 3745-77-07(A)(1)]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records for a minimum of five years that include the following information for each solvent purchased:

a. The date of the purchase;

b. The name, company identification, and chemical composition of the solvent; and

c. The vapor pressure of the solvent measured in mmHg at twenty degrees Celsius (sixty-eight degrees Fahrenheit), as determined by ASTM D2879-97, "Standard Test Method for Vapor Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope."

[Authority for term: OAC rule 3745-21-09(O)(2)(e)(ii) and OAC rule 3745-77-07(A)(1)]

(2) The permittee shall maintain records for at least five years of the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit, and make these records available to the Director upon verbal or written request.

[Authority for term: OAC rule 3745-21-09(O)(5), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall maintain records of the following information, collected at the end of each year:

a. the total cleaning solvent added to the cold cleaner or the amount purchased for use in the emissions unit during the year;

b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and

c. the estimated annual VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)].

e) Reporting Requirements

(1) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)].

f) Testing Requirements

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

a. Emission Limitation:

4 tons per year of VOC emissions

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be based on the record keeping requirements established in d)(3) above.

g) Miscellaneous Requirements

(1) None.