

**Synthetic Minor Determination and/or Netting Determination
Permit To Install: 15-01649**

A. Source Description

This emission unit is a metal coating line using HAP containing coatings. The emission unit does not utilize a control device

B. Facility Emissions and Attainment Status

The source emits both VOC and HAPs. Currently Stark county is in non-attainment for VOC but the PTE does not exceed any major source thresholds for VOC. Since the PTE for VOC exceeds the 10/25 tpy HAP thresholds for Title V and there is no restriction on the HAP content of the coatings, this PTI is written restricting the HAP usage in the coatings via a synthetic minor.

C. Source Emissions

See section B above.

D. Conclusion

Annual PTE = 12 lbs VOC/hr. x 8760/2000 = 53 tons/yr. The only other VOC emission unit at this source is K001 which is limited to 30 tpy VOC. The total VOC emitted from this source does not trigger NSR or Title V permitting.

However since the PTE for VOC is in excess of 10 tpy, the potential to exceed HAP's Title V threshold exists. Therefore, this PTI is written as a synthetic minor for HAP's. The limits are 9.9 tpy for any single HAP and 24.9 tpy for all HAP compounds monitored on a rolling, 12 month summation to maintain federal enforceability.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
STARK COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

Application No: 15-01649

Fac ID: 1576011632

DATE: 5/8/2007

A.J. Oster Foils, Inc.
Phillip Tischler
2081 McCrea St.
Alliance, OH 44601-2704

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1250** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

Canton LAA

STARK COUNTY AREA TRANS STUDY

WV

PA

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL
15-01649 FOR AN AIR CONTAMINANT SOURCE FOR **A.J. Oster Foils, Inc.**

On 5/8/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **A.J. Oster Foils, Inc.**, located at **2081 McCrea St., Alliance, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 15-01649:

Installation of a new rotogravure coating line.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dan Aleman, Canton City Health Department, 420 Market Avenue, Canton, OH 44702-1544
[(330)489-3385]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 15-01649

Application Number: 15-01649
Facility ID: 1576011632
Permit Fee: **To be entered upon final issuance**
Name of Facility: A.J. Oster Foils, Inc.
Person to Contact: Phillip Tischler
Address: 2081 McCrea St.
Alliance, OH 44601-2704

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2081 McCrea St.
Alliance, Ohio**

Description of proposed emissions unit(s):
Installation of a new rotogravure coating line.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

A.J. Oster Foils, Inc.

Facility ID: 1576011632

PTI Application: 15-01649

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) 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.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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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.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	53

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K002) - Metal rotogravure coating line

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	12 lbs VOC/hr. See section A.2.b.
OAC rule 3745-31-05(C)	See section A.2.a
OAC rule 3745-21-09(E)	2.6 lbs VOC/gallon of coating (minus water and non-regulated solvents)
40 CFR Part 60.462(a)(1) (Subpart TT)	0.28 kg VOC per liter of coating solids applied for each calendar month

2. Additional Terms and Conditions

- 2.a The permittee shall not emit any single Hazardous Air Pollutant(HAP) in a total quantity exceeding 9.9 tons HAP/year or any total amount of combined HAP's in a quantity exceeding 24.9 tons/yr. from both this emission unit and emission unit K001 as a rolling, 12 month summation.
- 2.b This emission limitation is based on the emissions units potential to emit. Therefore, no monitoring, record keeping, or reporting is necessary to ensure compliance with this emission limit.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records specifying the following information for each coating and non-acetone cleanup material used at this emission unit:

Emissions Unit ID: **K002**

- a. The company surface coating and non-acetone cleanup material identification;
- b. The number of gallons of surface coating and non-acetone cleanup material employed;
- c. The VOC content, in pounds of VOC per gallon of coating(minus water and non-regulated solvent);
- d. The non-volatile(solids) content, in percent by volume;
- e. The water content of each coating, in percent by volume; and
- f. The density(in pounds per gallon) of each coating and non-acetone cleanup material employed.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to a specific gallons/year or tons per year limitation, or just a "tons/year" limitation in a Permit-to-Install. In such cases, for each such new emissions unit only, the above mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

2. The permittee shall maintain monthly records specifying the following information for each coating and non-acetone cleanup material used at this emission unit and emission unit K001:
 - a. The HAP content, in weight percent, of each coating and non-acetone cleanup solvent employed;
 - b. The tons of each HAP emitted per month calculated as follows:

(gallons coating used each month) x (individual HAP content of each coating used in percent by weight) x (density of the coating used in lbs coating/gallon coating)/2000
 - c. A rolling, 12 month summation of:
 - (1) each individual HAP emitted by this emission unit and emission unit K001, in tons; and
 - (2) the total combined HAP emitted by this emission unit and emission unit K001, in tons.

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3. The permittee shall compute and maintain records of the average monthly volume-weighted emissions of VOC in kg/gallon of coating solids applied during each calendar month for this emission unit according to all applicable procedures and methods specified in 40 CFR Part 60.463(c).

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D. 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 within 30 days following the end of the calendar month.
2. The permittee shall include in the initial compliance report required by 40 CFR Part 60.8 and section E of this PTI, the weighted average of the VOC content of coatings used during a period of one calendar month for this emission unit.
3. Following the initial performance test as specified in 40 CFR Part 60.8 and section E of this PTI, the permittee shall identify, record, and submit a written report to the Administrator(US EPA) and the Canton Local Air Agency every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids is greater than 0.28 kg VOC per liter of coating solids applied. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator of US EPA and the Canton local air agency semiannually.
4. The permittee shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable.

E. Testing Requirements

1. Compliance with the emission limitations of this permit shall be demonstrated by using the following methods and procedures:
 - a. Emission Limitation:

12 lbs VOC/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by the use of a stack test conducted in accordance with US EPA Method 25 or 25A as specified in 40 CFR Part 60, Appendix A.
 - b. Emission Limitation:

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Emissions Unit ID: K002

2.6 lbs VOC/gallon of coating (minus water and non-regulated solvents)

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Applicable Compliance Method:

The use of monitoring and record keeping as specified in section C.1.

c. Emission Limitation:

0.28 kg VOC per liter of coating solids applied for each calendar month

Applicable Compliance Method:

The use of monitoring and record keeping as specified in section C.3.

d. Emission Limitation:

The permittee shall not emit any single Hazardous Air Pollutant(HAP) in a total quantity exceeding 9.9 tons HAP/year or any total amount of HAP's in a quantity exceeding 24.9 tons/yr. from both this emission unit and emission unit K001 as a rolling, 12 month summation.

Applicable Compliance Method:

The use of monitoring and record keeping as specified in section C.2.

2. The permittee shall conduct an initial performance test as required under 40 CFR Part 60.8(a) and thereafter a performance test for each calendar month for the facility according to the procedures in section 40 CFR Part 60.463(c). The performance test shall be conducted to demonstrate compliance with the compliant coatings limitation and mass emission limitation for VOC specified in section A.1.
 - a. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup and at such other times as may be required by the Administrator under section 114 of the Act, the permittee shall conduct performance test(s) and furnish the Administrator a written report of the results of such performance test(s).
 - b. Performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in section 40 CFR Part 60.463(c) or as the Administrator (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, (3) approves the use of an alternative method the results of which he has determined to be adequate for indicating whether a specific

Emissions Unit ID: **K002**

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source is in compliance, (4) waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Administrator's satisfaction that

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the affected facility is in compliance with the standard, or (5) approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Administrator's authority to require testing under section 114 of the Act.

- c. The Performance test shall be conducted under such conditions as the Administrator shall specify based on representative performance of this emission unit. The permittee shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.
- d. The permittee shall provide the Administrator and the Canton local air agency at least 30 days prior notice in the form of an complete Intent-to-Test (ITT) of any performance test, except as specified under other subparts, to afford the Administrator the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the Administrator (or delegated State or local agency) as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Administrator (or delegated State or local agency) by mutual agreement.
- e. The permittee shall provide, or cause to be provided, performance testing facilities as follows:
 - i. Sampling ports adequate for test methods applicable to such facility. This includes (i) constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and (ii) providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
 - ii. Safe sampling platform(s).
 - iii. Safe access to sampling platform(s).

Emissions Unit ID: **K002**

- iv. Utilities for sampling and testing equipment.
- f. Unless otherwise specified in the applicable subpart, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Administrator's approval, be determined using the arithmetic mean of the results of the two other runs.

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Emissions Unit ID: **K002**

SIC CODE 5051 SCC CODE 49483994884939 EMISSIONS UNIT ID K002
 EMISSIONS UNIT DESCRIPTION Metal rotogravure coating line

DATE INSTALLED _____

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

<u>Pollutants</u>	<u>Air Quality Description</u>	<u>Actual Emissions Rate</u>		<u>PTI Allowable</u>	
		<u>Short Term Rate</u>	<u>Tons Per Year</u>	<u>Short Term Rate</u>	<u>Tons Per Year</u>
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				12.0 lbs/hr. 2.6 lbs VOC/gallon of coating	
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					9.9 (Individual HAP) 24.9 (total HAP)

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part NESHAP? No PSD? No OFFSET POLICY? No
60, Subpart TT

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination 12.0 lbs/hr.VOC by the use of compliant coatings

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: na