

1

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may 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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

2

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

3

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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 and regulations.

4

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

5

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
---	---	------------------------------	---	--

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Stolle Products** located in **Shelby** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>
---	--

K048	Metal screen printing line
------	-------------------------------

K048
Cont'd

Facility Name: **Stolle Products**
Application Number: **05-9516**
Date: **December 3, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
---	---	------------------------------	---	--

BAT
Determination

*

*

*

*

**

Facility Name: **Stolle Products**
 Application Number: **05-9516**
 Date: **December 3, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
---	---	------------------------------	---	--

Applicable
Federal &
OAC Rules

3745-31-05

3745-21-09
(U) (1) (a)

3745-21-09
(U) (1) (c)

3745-21-09
(U) (1) (i)

3745-21-09
(U) (2) (f)

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	Permit Allowable Mass Emissions and/or Control/Usage Requirements	coating) shall not exceed 1.1 when applying protective coating (film).		
	VOC emissions shall not exceed 367 pounds/day, 29.3 TPY	The VOC content (pounds VOC/gal coating) shall not exceed 5.21 when applying non-compliant base coat and nonemclature inks.		
	The VOC content (pounds VOC/gal coating) shall not exceed 4.0 when applying clear coating.			
	The VOC content (pounds VOC/gal coating) shall not exceed 2.0 when applying extreme performance coating.			
	The VOC content (pounds VOC/gal			

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

- * BAT has been determined as compliance with the applicable OAC rules/specified allowable emission rates; compliance with Ohio EPA's Air Toxics Policy.
- ** BAT has been determined as compliance with the applicable OAC rules/specified allowable emission rates (based upon vendor information provided in the application documenting non-existence of compliant non-white/almond base coatings and nonemclature inks); compliance with Ohio EPA's Air Toxics Policy.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	29.3

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Introduction

1. This permit to install (PTI) will allow Stolle Products to install a new printing line K048. Stolle Products is a major facility. Issuance of this federally enforceable permit will result in an increase of 29.3 tons of organic compounds per year which is below the 40 TPY major modification threshold.

B. Applicable Emission Limitations and/or Control Requirements

1. This permit is based on the use of the photochemically reactive materials specified by the permittee in PTI application number 05-9516. In conjunction with best available technology requirements of OAC 3745-31-05, the emission limitations specified in the following table were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on the photochemically reactive material formulation data and the design parameters of the emission unit's exhaust system as specified in the application. Compliance with Ohio EPA's "Air Toxics Policy" was demonstrated based on the following data input to the Screen3 model:

Pollutant	TLV (ug/m³)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³)	Maximum Acceptable Ground-Level Concentration (MAGLC = TLV/42) (ug/m³)
Isophorone	20636	14.96	50.80	491.3

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

NOTE: All emissions were assumed to be from the most toxic compound applied. Modeling results were compared to the MAGLC of the most toxic compound. This assumption provides operational flexibility in the use of less toxic compounds. The TLV for isophorone was obtained from ACGIH's 1997 Handbook. If the TLV for isophorone decreases in any future ACGIH Handbook, K048 shall remain in compliance with the MAGLC specified above.

2. Any of the following changes may be deemed a modification to the emissions unit and, as such, prior notification to and approval from Ohio EPA's Southwest District Office are required:
 - a. any change in the composition of the coatings/solvents 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 specified in the above table;
 - b. any change to the emission unit or its exhaust parameters (e.g. increased emission rate, reduction of exhaust gas flow rate, decreased stack height) that would result in an exceedance of the Maximum Acceptable Ground Level Concentration (MAGLC) specified in the above table;
 - c. any change in the composition of the coatings/solvents that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)];
 - d. any change in the composition of the coatings/solvents that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC 3745-77-01(V); and,
 - e. any change to the emission unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as otherwise defined in OAC rule 3745-31-01.

C. Operational Restrictions

1. The emissions of volatile organic compounds from emission unit K048 shall not exceed 29.3 tons per year, based upon a rolling 12-month summation of the monthly emissions. Stolle Products maintained usage and emission records for emission units K004-K009. Stolle plans on decommissioning these emission units within approximately one year upon installation of K048. Therefore, no monthly restrictions are being

12

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

placed on K048 for its first 12 months of operation.

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

2. For Coatings applied in K048 in Compliance with Requirements within OAC 3745-21-09(U)(1)

a. Usage Requirements

The maximum annual coating usage rates for the following coatings based on a rolling, 12-month summation of monthly coating usage shall not exceed:

<u>Type of Coating</u>	<u>(Gallons)</u>	<u>Maximum Annual Coating Usage</u>
i. clear coating		4818
ii. extreme performance coating		19,710
iii. any coating not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC 3745-21-09	21,900	

b. VOC Content Requirements

The maximum VOC contents for the following coatings shall not exceed:

<u>Type of Coating</u>	<u>Maximum VOC Content</u> <u>(lb VOC/gallon coating)</u>
i. clear coating	4.0
ii. extreme performance coating	2.0
iii. any coating not regulated under paragraphs (U)(1)(a) to (U)(1)(h) of OAC 3745-21-09	1.1

3. For Coatings applied in K048 subject to the Requirements within OAC 3745-21-09(U)(2)(f)

a. Usage Requirements

The maximum annual coating usage rate based on a rolling, 12-month summation of monthly coating usage shall not exceed 11,125 gallons.

b. VOC Content Requirements

14

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

The maximum VOC content (lb VOC/gal coating) shall not exceed 5.21.

4. For Cleanup and Pan Solvent applied in K048

a. Usage Requirements

The maximum annual solvent usage rate based on a rolling, 12-month summation of monthly usage shall not exceed 4351 gallons.

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

5. For all Coating/Cleanup Activities associated with K048 (refer to terms C.1.-C.4. above)

a. Usage Requirements

The maximum annual coating and solvent usage rates based on a rolling, 12-month summation of monthly usage shall not exceed 57,553 gallons and 4351 gallons, respectively.

D. Monitoring and/or Recordkeeping Requirements

1. Recordkeeping requirements for Coatings applied in K048 in Compliance with Requirements within OAC 3745-21-09(U)(1)

The permittee shall collect and record the following information each month for VOC-emitting coating material applied in K048:

- a. the name and identification number of each coating material applied;
- b. the volume in gallons, of each coating material applied;
- c. the VOC content of each coating material as applied, in pounds per gallon, excluding water and exempt solvents;
- d. the total VOC emissions from all coating materials applied, in tons; and,
- e. the rolling 12-month summation of the VOC emission rates, in tons (beginning the first full calendar month following the start up of emissions unit K048).

2. Recordkeeping requirements for Coatings applied in K048 subject to the Requirements within OAC 3745-21-09(U)(2)(f)

- a. The permittee shall collect and record the following information each month for VOC-emitting coating material applied in K048:
 - i. the name and identification number of each coating material applied;

16

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

- ii. the volume in gallons, of each coating material applied;

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

- iii. the VOC content of each coating material as applied, in pounds per gallon, excluding water and exempt solvents;
 - iv. the total VOC emissions from all coating materials applied, in tons; and,
 - v. the rolling 12-month summation of the VOC emission rates, in tons (beginning the first full calendar month following the start up of emissions unit K048).
- b. This facility shall implement a coating reformulation program to identify compliant coatings which meet the facility's specifications. Upon successful trial of a new coating, this facility shall notify Ohio EPA's, Southwest District Office prior to any permanent transition from the old coating to the new.

Annual reports that document this ongoing research and development shall be submitted to Ohio EPA's Southwest District Office. The reports shall be submitted to Ohio EPA's Southwest District Office. The reports shall contain, at a minimum, letters from coating suppliers outlining current efforts, results of any trial coating application, and any projected use of any alternative coating.

3. For Cleanup and Pan Solvent applied in K048

The permittee shall collect and record the following information each month for the clean-up and pan solvent applied in K048:

- a. the name and identification number of each solvent applied;
- b. the volume in gallons, of each solvent applied;
- c. the VOC content of each solvent;
- d. the total VOC emissions from all solvent applied, in pounds and tons; and,
- e. the rolling 12-month summation of the VOC emission rates, in tons (beginning the first full calendar month following the start up of emissions unit K048).

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

4. Record Retention Requirement

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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

E. Reporting Requirements

1. The permittee shall submit required reports in the following manner:
 - a. the permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for organic compounds;
 - b. the permittee shall notify the Ohio EPA's Southwest District Office in writing of any daily record showing the use of coatings that do not meet their VOC content limit. The notification shall be sent to the Ohio EPA, Southwest District Office within 30 days following the end of the calendar month;
 - c. the permittee shall also submit annual reports which specify the total VOC emissions from and coating reformulation efforts for K048 for the previous calendar year. These reports shall be submitted by February 15 of each year; and,
 - d. 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 Ohio EPA's Southwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during that quarter. The reports

Facility Name: **Stolle Products**

Application Number: **05-9516**

Date: **December 3, 1998**

shall be submitted quarterly, i.e., by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude such deviations resulting from any malfunction reported in accordance with OAC rule 3745-15-06).

F. Testing Requirements

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

For all Coating/Cleanup Activities associated with K048

a. Emission Limitation

The emission limitations presented above are the maximum limits associated with each category of coating/solvent. The combined VOC emission rate **shall never exceed 367 pounds per day**.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Sections D.1., D.2. and D.3.

b. Emission Limitation

The emission limitations presented above are the maximum limits associated with each category of coating/solvent. The combined VOC emission rate **shall never exceed 29.3 tons per year, based upon a rolling, 12-month summation**.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Sections D.1., D.2. and D.3.

2. USEPA Method 24 shall be used to determine the VOC contents for coatings. If pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.