



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

3/4/2016

Heather Valentino  
 Marking Films Div. of Avery Dennison Building #11  
 670 Hardy Road  
 Painesville, OH 44077

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0243001188  
 Permit Number: P0120169  
 Permit Type: Initial Installation  
 County: Lake

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Lake County News-Herald. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
 Permit Review/Development Section  
 Ohio EPA, DAPC  
 50 West Town Street, Suite 700  
 P.O. Box 1049  
 Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office  
 2110 East Aurora Road  
 Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification  
 Ohio EPA-NEDO; Pennsylvania; Canada



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The Marking Films Division of Avery Dennison Building #11 is a manufacturer of graphics and reflective products.

This is an initial PTI for K005: a coating line including an organisol coating station and oil-heated oven; barrier gravure casting station and oil-heated oven; and corona treater. Permanent total enclosure captures VOC emissions from casters and ovens for destruction in a regenerative thermal oxidizer (RTO).

3. Facility Emissions and Attainment Status:

The facility is located in Lake County, which is currently a non-attainment area for the ozone 8-hour NAAQS.

VOC is less than 40 TPY controlled (39.9 TPY VOC) to avoid NNSR. A toxics review was conducted and passed.

4. Source Emissions:

See 7. and emissions calculations attached to the permit detail page for P0120169.

K005 will be required to conduct a performance test to ensure 98% overall VOC emission reduction per 40 CFR Part 63 Subpart JJJJ within 3 months after start-up.

Air toxics modeling was performed for toluene, and emissions were calculated to be less than 80% of the MAGLC.

5. Conclusion:

Facility will avoid NNSR by limiting VOC emissions under 40 TPY with the use of a regenerative thermal oxidizer (RTO) that meets 99.6% destruction efficiency and 100% capture efficiency (99.6% overall VOC emission reduction) and will comply with the 98% control requirement of 40 CFR Part 63 Subpart JJJJ.

6. Please provide additional notes or comments as necessary:

None.



7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	37.90
NO <sub>x</sub>	7.94
CO	6.67
PM	0.60

## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install Initial Installation

Marking Films Div. of Avery Dennison Building #11

670 Hardy Road, Building #11, Painesville, OH 44077

ID#: P0120169

Date of Action: 3/4/2016

Permit Desc: Initial PTI for K005: a casting line including an Organisol casting station and oil-heated oven; barrier gravure casting station and oil-heated oven; and corona treater (de minimis). Permanent total enclosure captures VOC emissions from casters and ovens for destruction in a regenerative thermal oxidizer..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Larry Maline, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install**

for

Marking Films Div. of Avery Dennison Building #11

Facility ID:	0243001188
Permit Number:	P0120169
Permit Type:	Initial Installation
Issued:	3/4/2016
Effective:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Marking Films Div. of Avery Dennison Building #11

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**Draft Permit-to-Install**  
Marking Films Div. of Avery Dennison Building #11  
**Permit Number:** P0120169  
**Facility ID:** 0243001188  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0243001188  
Facility Description: Pressure sensitive tape and film manufacturer  
Application Number(s): A0054702  
Permit Number: P0120169  
Permit Description: Initial PTI for K005: a casting line including an Organisol casting station and oil-heated oven; barrier gravure casting station and oil-heated oven; and corona treater (de minimis). Permanent total enclosure captures VOC emissions from casters and ovens for destruction in a regenerative thermal oxidizer.  
Permit Type: Initial Installation  
Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 3/4/2016  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Marking Films Div. of Avery Dennison Building #11  
670 Hardy Road  
Building #11  
Painesville, OH 44077

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)963-1200

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the 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

Craig W. Butler  
Director



**Draft Permit-to-Install**  
Marking Films Div. of Avery Dennison Building #11  
**Permit Number:** P0120169  
**Facility ID:** 0243001188  
**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0120169

Permit Description: Initial PTI for K005: a casting line including an Organisol casting station and oil-heated oven; barrier gravure casting station and oil-heated oven; and corona treater (de minimis). Permanent total enclosure captures VOC emissions from casters and ovens for destruction in a regenerative thermal oxidizer.

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

<b>Emissions Unit ID:</b>	<b>K005</b>
Company Equipment ID:	F5 coating line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install**  
Marking Films Div. of Avery Dennison Building #11  
**Permit Number:** P0120169  
**Facility ID:** 0243001188  
**Effective Date:** To be entered upon final issuance

## **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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.

- 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 permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

#### **4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) 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 of an 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 appropriate Ohio EPA District Office or contracted

local air agency, 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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, 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 ORC section 3704.08.
  - (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 Ohio EPA DAPC, Northeast District Office 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- 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 state-only required 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 DAPC, Northeast District Office. 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.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. 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.

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

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.

**16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

**19. 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.



**Draft Permit-to-Install**  
Marking Films Div. of Avery Dennison Building #11  
**Permit Number:** P0120169  
**Facility ID:** 0243001188  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install**  
Marking Films Div. of Avery Dennison Building #11  
**Permit Number:** P0120169  
**Facility ID:** 0243001188  
**Effective Date:** To be entered upon final issuance

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 emissions unit contained in this permit, K005, is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ. 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 Ohio EPA's Northeast District Office (NEDO).



**Draft Permit-to-Install**  
Marking Films Div. of Avery Dennison Building #11  
**Permit Number:** P0120169  
**Facility ID:** 0243001188  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. K005, F5 coating line**

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

Coating line including an organisol coating station and oil-heated oven; barrier gravure coating station and oil-heated oven; and corona treater (de minimis). Permanent total enclosure captures VOC emissions from coaters and ovens for destruction in a regenerative thermal oxidizer.

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) b)(1)e

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.	ORC 3704.03(T)	Compliance with 40 CFR Part 63, Subpart JJJJ.  The control requirements of 40 CFR Part 63, Subpart JJJJ are less stringent than the voluntary control efficiency restriction identified under OAC rule 3745-31-05(F) and the associated annual emission limitation specified under OAC rule 3745-31-05(D).  See b)(1)d and b)(1)e.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.66 ton per month, averaged over a 12-month, rolling period.  Carbon monoxide (CO) emissions shall not exceed 0.56 ton per month, averaged over a 12-month, rolling period.  Ozone (O <sub>3</sub> ) emissions from the Corona Treater shall not exceed 0.11 ton per month, averaged over a 12-month, rolling period.  See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO <sub>x</sub> , CO, and O <sub>3</sub> emissions from this air contaminant source since the potential to emit is less than 10 tons/year.  See b)(2)b.
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid NNSR	Volatile organic compound (VOC) emissions shall not exceed 39.9 tons per rolling, 12-month period for all coatings and cleanup materials.  See c)(12).
e.	OAC rule 3745-31-05(F)  Voluntary restriction to limit VOC emissions through PTE capture and increased RTO control efficiency above MACT standard requirements in order to avoid NNSR.	Overall VOC emissions shall be reduced by 99.6%, by weight (100% capture efficiency through the use of a permanent total enclosure (PTE) and 99.6% destruction efficiency) for all solvent based coatings.  See b)(1)d.  The BAT determination also includes compliance with OAC rule 3745-21-09(F), 40 CFR Part 60, Subpart RR and 40 CFR Part 63, Subpart JJJJ.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR Part 63, Subpart JJJJ	<p>Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 2 percent of the organic HAP applied for each month (98 percent reduction) at new affected sources.</p> <p>The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05(F) and are more stringent than those specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1).</p>
g.	OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(F)(1)	See b)(2)f.
h.	OAC rule 3745-21-09(F)(2)(a)(i)	See b)(2)f.
i.	OAC rule 3745-21-09(F)(2)(b)	See c)(8).
j.	40 CFR Part 60, Subpart RR	The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05(F) and OAC rule 3745-31-05(D).
k.	40 CFR Part 64	<p>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.</p> <p>The VOC emission limitations in ORC 3704.03(T) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with sections 63.3321(b), 63.3350, 63.3400(c) and 63.3410 of 40 CFR Part 63, Subpart JJJJ.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
I.	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 sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

(2) Additional Terms and Conditions

- a. This BAT emission limitation applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. The NO<sub>x</sub>, CO, and O<sub>3</sub> emission limitations were established for 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 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 permit to install or a new final permit to install prior to the change(s).

These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP).

- c. The permittee shall properly install, adjust, operate and maintain, in accordance with the manufacturer's recommendations, instructions and operating manual(s), a regenerative thermal oxidizer (RTO) 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.
- d. Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR 63.3330, the source must limit HAP emissions from the affected source to:
  - i. no more than 2 percent of the organic HAP applied for each month (98 percent reduction); or
  - ii. no more than 1.6 percent of the mass of coating materials applied for each month; or
  - iii. no more than 8 percent of the coating solids applied for each month.

The permittee shall operate the RTO such that an outlet organic HAP concentration of no greater than 20 ppmv by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

- e. The permanent total enclosure for this emissions unit, shall comply with the requirements of 40 CFR Part 51, Appendix M, Reference Method 204, to capture all VOC emissions from this emissions unit during all coating operations.
- f. The control requirements specified by this rule are less stringent than the control requirements specified under OAC rule 3745-31-05(F), 40 CFR Part 63, Subpart JJJJ, section 63.3320(b)(1) and is equivalent to the control efficiency identified under 40 CFR Part 60, Subpart RR, section 60.442(a)(1).

c) Operational Restrictions

- (1) This emissions unit shall be totally enclosed such that all VOC emissions are captured, contained, and when employing coating, vented to the RTO. Compliance with the following criteria, as specified in USEPA Method 204, shall be met by the permittee:
  - a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Director or Administrator.
  - b. The total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
  - c. The average facial velocity (FV) of air through all NDOs shall be either at least 3,600 meters/hr (200 fpm) or meet the pressure differential requirement across the enclosure as described in the Method. The direction of air flow through all NDOs shall be into the enclosure.
  - d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.
  - e. All VOC emissions must be captured and vented to the RTO as described in Method 204.
- (2) The RTO control system shall be designed and operated according to good engineering practices and the manufacturer's recommendations and specifications.
- (3) When this emissions unit is in operation, the PTE shall be maintained under negative pressure at a minimum differential pressure, in inches of water as a 3-hour average, that is equal to or greater than the differential pressure that was established at the time of the last emissions test that demonstrated compliance with the corresponding facial velocity or pressure drop criteria for the permanent total enclosure. The differential pressure corresponding to the 200 fpm facial velocity shall be determined for the PTE when compliance with the facial velocity is demonstrated.

(4) The concentrations of VOC emissions for this emissions unit, determined in accordance with the leak monitoring program currently employed at Building 11 for the permanent total enclosure, shall not exceed 100 ppm, by volume.

(5) During the required use of the RTO, the permittee shall ensure that any inline bypass that could divert solvent laden air from any coating applicator to the ambient air is closed.

In addition, any device in the bypass which indicates a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

(6) Pursuant to 40 CFR 63.3321 and on the compliance date specified in 40 CFR 63.3330, the affected source must comply with the following operating limit:

The average combustion temperature within the RTO serving this emissions unit in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3360(e)(3)(i).

(7) Pursuant to 40 CFR 63.6(e)(3), the owner or operator of an affected source must develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; a program of corrective action for malfunctioning process; and air pollution control and monitoring equipment used to comply with the relevant standard. This plan must be developed by the owner or operator by the source's compliance date for that relevant standard. The purpose of the startup, shutdown, and malfunction plan is listed below:

a. ensure that, at all times, the owner or operator operates and maintains each affected source, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by the relevant standards;

b. ensure that owners or operators are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAPs; and

c. reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(8) 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 90%, 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 emissions from cleaning of storage, mixing and conveying equipment.
- (9) The RTO 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 RTO 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.
- (10) The emissions unit, vented to the RTO 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 RTO.
- (11) The permittee shall store all waste materials in closed containers with tightly fitted covers.
- (12) VOC emissions shall not exceed 39.9 tons per rolling, 12-month period for all coatings and cleanup materials.

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

Month	Maximum Allowable Emissions Rates in Tons
1	3.32
1-2	6.65
1-3	9.97



1-4	13.29
1-5	16.61
1-6	19.93
1-6	23.25
1-8	26.57
1-9	29.89
1-10	33.21
1-11	36.53
1-12	39.9

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

- (13) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3321(a) and Table 1	operating limits if using add-on control devices and capture system
63.3370(a)(4) and (5)	how to demonstrate compliance with the emission standard
63.3370(e)	capture system and control device operating requirements
63.3370(j)	capture and control system compliance demonstration procedures using a CPMS
63.3370(k)	oxidizer compliance demonstration procedures

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall document all times the RTO and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, in any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, must not fall below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

- (3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the RTO was/were in operation, during which the average combustion temperature within the RTO was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and RTO, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

- (4) Whenever the monitored average combustion temperature within the RTO 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 Ohio EPA Northeast District Office (NEDO). 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.

- (5) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):
  - a. the measured diameter of each natural draft opening;
  - b. the distance measured from each natural draft opening to each VOC emitting point;
  - c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;
  - d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
  - e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.
- (6) The permittee shall install, and thereafter operate and maintain, a continuous pressure drop monitor and recorder that continuously measures and records the pressure drop across the permanent total enclosure when the emissions unit is in operation. Units shall be in inches of water. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The pressure drop 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 each day:

- a. all 3-hour blocks of time when the emissions unit is in operation, during which the permanent total enclosure was not maintained at or above the minimum pressure differential, in inches of water as a 3-hour average, specified in c)(1)c; and
  - b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.
- (7) The permittee shall inspect and monitor quarterly with a Photoionization Detector or equivalent device all positive pressure locations between the permanent enclosure of the coater and the RTO for unacceptable VOC levels (greater than 100 ppm) and maintain records of the results in accordance with the permittee's leak monitoring program or equivalent. Records shall be maintained of the inspection results and shall include the following:
- a. line speed;
  - b. fan speed;
  - c. VOC content of the coating applied at the time of monitoring;
  - d. documentation of any unacceptable level of VOCs; and
  - e. any corrective actions taken in response to any detected leaks.

The concentrations of VOC emissions measured in accordance with the leak monitoring program for the permanent total enclosure shall not exceed 100 ppm, by volume.

- (8) The permittee shall employ the currently effective plan for preventive maintenance and repair of leaks within the solvent capture and destruction system.

Equipment subject to the plan shall include all ductwork from the enclosures of the heads of the coater to the RTO fan covers.

- (9) Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

- (10) The permittee shall maintain records of the maintenance and operation of the LEL units, or any other device or means approved by the Ohio EPA, which ensure that the emissions do not go directly to the ambient air, and these records shall be made available to the Director or his representative upon request during normal business hours.

The permittee shall record the date and duration of each period of bypassing while the emissions unit is in operation.

- (11) The permittee shall collect and record the following information daily for all the coatings employed in this emissions unit that are vented to the RTO and the cleanup materials associated with these coatings:



- a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating, excluding water and exempt solvents, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed, excluding water and exempt solvents;
  - d. the name and identification of each cleanup material employed;
  - e. the number of gallons of each cleanup material employed;
  - f. the VOC content of each cleanup material, in pounds per gallon;
  - g. the total uncontrolled VOC emissions from all coatings, in tons;
  - h. the total uncontrolled VOC emissions from all cleanup materials, in tons;
  - i. the calculated, controlled VOC emission rate for all coatings, in tons (the controlled VOC emission rate for the coatings 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, i.e., controlled VOC emissions from all coatings plus uncontrolled emissions from all cleanup materials, in tons.
- (12) 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 uncontrolled VOC emissions from all the coatings and cleanup materials employed [summation of (b x c) for all coatings + summation of (e x f) for all cleanup materials], in pounds or tons; and
  - h. the calculated, controlled VOC emission rate for all the coatings and cleanup materials, 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).



- (13) The permittee shall collect and record monthly the following information for all coatings and all cleanup materials employed in this emissions unit:
  - a. the monthly sum of the daily values from d)(11); and
  - b. the cumulative, year-to-date, VOC emissions for the calendar year, in tons.
- (14) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3350(a)	summary of control device and capture system monitoring
63.3350(b)	monitoring required after date of initial performance test
63.3350(c)	bypass mode monitoring by flow control position indicator
63.3350(e)(1) through (9)	continuous parameter monitoring system (CPMS)
63.3350(f)	capture system monitoring
63.3360(e)	performance test operating limits
63.3410(a)	monthly record requirements

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify:
  - a. a log of operating downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
  - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below the combustion temperature limit established according to section 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.

- (2) The permittee shall submit deviation (excursion) reports that identify any time periods when the RTO 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.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential required in c)(3).
- (4) The permittee shall submit deviation (excursion) reports that identify any record indicating that the rolling, 12-month summation of VOC emissions, or the annual VOC emissions exceeded 39.9 tons per year, and the actual rolling, 12-month summation and/or the actual annual VOC emissions.
- (5) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- (6) The permittee shall notify the Director (Ohio EPA NEDO) in writing of any quarterly record showing any unacceptable level of VOCs (greater than 100 ppm) from the positive pressure locations of the lines between the permanent total enclosure and the RTO. A copy of the record shall be sent to the Ohio EPA NEDO within 30 days following the end of the calendar month in which the exceedance occurred.
- (7) The permittee shall submit quarterly deviation reports that identify all exceedances of the 100 ppm, by volume, VOC concentration limitation specified in c)(4).
- (8) The permittee shall submit semiannual reports and other such notifications and reports to the Ohio EPA NEDO as required pursuant to 40 CFR Part 63, Subpart JJJJ, per the following sections:

63.3400(a)	general requirement to submit notifications and reports
63.3400(b)	initial notification
63.3400(c)	semiannual compliance report
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

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 3 months after startup.
  - b. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency requirement for the permanent total enclosure.

- c. The emission testing shall be conducted to demonstrate compliance with the 99.6% overall VOC emission reduction requirement.

[Note: Compliance with the 98% overall HAP emission reduction requirement is assumed if the permittee demonstrates compliance with the 99.6% overall VOC emission reduction requirement.]

- d. The following test method(s) shall be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC:

i. The capture efficiency shall be determined by using Methods 204 through Method 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 "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA's Northeast District Office will consider the request for the use of an alternative method, including an evaluation of the applicability, necessity and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)

ii. 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 [i.e. USEPA Method 25 or 25A per (C)(2)(a)] 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.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA's Northeast District Office (NEDO).

- 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 NEDO. 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 Ohio EPA NEDO. 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 NEDO's refusal to accept the results of the emission test(s).





d. Emission Limitation:

O<sub>3</sub> emissions from the Corona Treater shall not exceed 0.11 ton per month, averaged over a 12-month, rolling period.

Applicable Compliance Method:

The O<sub>3</sub> emission limitation was established for 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 limitation.

e. Emission Limitation:

Organic HAP emissions shall be limited to no more than 2 percent of the organic HAP applied for each month (98 percent reduction) at new affected sources.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitation above shall be demonstrated as described in section 63.3370(e) of 40 CFR Part 63, Subpart JJJJ and section 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

f. Emission Limitation:

VOC emissions shall not exceed 39.9 tons per rolling, 12-month period for all coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(11) d)(12) and d)(13).

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

63.3360(e)(1)	initial control device efficiency
63.3360(e)(2)	records of process information during performance test
63.3360(e)(3)(i)	establish operating limit for combustion temperature
63.3360(f)	initial capture efficiency

g) Miscellaneous Requirements

- (1) No stack bypass exists on this emissions unit except an emergency bypass that is only to be utilized during periods of emergency or upset conditions.