



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

3/16/2016

Certified Mail

Mr. Steve Heimberger
Mondi Akrosil, LLC
3165 Wilson Road
Lancaster, OH 43130

Facility ID: 0123010216
Permit Number: P0082464
County: Fairfield

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Lancaster Eagle Gazette. A copy of the public notice, the Statement of Basis, 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 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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

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 if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-CDO; Kentucky

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

Draft Title V Permit Renewal

Mondi Akrosil, LLC

3165 Wilson Road, , Lancaster, OH 43130

ID#: P0082464

Date of Action: 3/16/2016

PermitDesc: Title V Renewal permit for continuous web paper coating lines with emissions captured with a permanent total enclosure (PTE) and controlled with a thermal incinerator..

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: Olen Ackman, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



Statement of Basis
 Mondi Akrosil, LLC
Permit Number: P0082464
Facility ID: 0123010216

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0123010216
Facility Name:	Mondi Akrosil, LLC
Facility Description:	Paper, Coated and Laminated: n.e.c.
Facility Address:	3165 Wilson Road, Lancaster, OH 43130
Permit #:	P0082464, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes.
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Statement of Basis
 Mondi Akrosil, LLC
Permit Number: P0082464
Facility ID: 0123010216

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	K001 and K002 are subject to 40 CFR Part 64 for VOC. Exempt for VOC per 64.2(b)(1)(i) due to compliance with 40 CFR Part 63 Subpart JJJJ.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.		40 CFR 63, Subpart JJJJ	Statement that K001 and K002 are subject to Subpart JJJJ and where to find the complete rule on-line.
B.3.		40 CFR 63, Subpart KK	Statement that K002 and K004 are subject to Subpart KK and where to find the complete rule on-line.
B.4.		40 CFR 60, Subpart RR	Statement that K001 and K002 are subject to Subpart JJJJ and where to find the complete rule on-line.
B.4.		40 CFR	B001 is a small gaseous fuel fired unit with heat input <10 mmBtu and may be subject to requirements.



Statement of Basis
Mondi Akrosil, LLC
Permit Number: P0082464
Facility ID: 0123010216

		63, Subpart DDDD	
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C. Emissions Unit Terms and Conditions

Key:													
EU = emissions unit ID							R = record keeping requirements						
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)							Rp = reporting requirements						
OR = operational restriction							ET = emission testing requirements (not including compliance method terms)						
M = monitoring requirements							St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement						
ENF = did noncompliance issues drive the monitoring requirements?							Misc = miscellaneous requirements						
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
K001 K002	30.08 lbs/hr of volatile organic compounds (VOC) from coating operations.	31-05(A)(3)		n	n	y	n	y	y	y	n	n	
K003	9.21 lbs/hr of ozone (O ³) and 40.3 tons per year from corona treatment operations.	31-05(A)(3)		n	n	n	n	n	n	y	n	n	
P001 P002	40 lbs/day organic compounds (OC) and 7.3 TPY.	31-05(A)(3)		n	y	y	n	y	y	y	n	n	
K001 K002	VOC emissions from coating usage shall not exceed 100.3 TPY, as a rolling, 12-month summation.	31-05(D)		n	y	y	n	y	y	y	n	n	
K001 K002	VOC emissions from cleanup	31-05(D)		n	y	y	n	y	y	y	n	n	



Statement of Basis
 Mondi Akrosil, LLC
 Permit Number: P0082464
 Facility ID: 0123010216

	usage shall not exceed 6.0 TPY, as a rolling, 12-month summation.												
K002	VOC emissions from printing usage shall not exceed 19.71 TPY, as a rolling, 12-month summation.	31-05(D)		n	y	y	n	y	y	y	n	n	
K001 K002	Solvent based coatings, as applied, that are vented to the thermal oxidizer shall meet the capture and control requirements	21-09(B)(6) in lieu of OAC rule 3745-21-09(F)(1)		n	y	y	n	y	y	y	n	n	
K001 K002 K003	Non-solvent based coatings that are not vented to the thermal oxidizer, as applied in the coating operations, shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exemptsolvents.	21-09(F)(1)		n	n	y	n	y	y	y	n	n	
K003	total maximum usage of coating and inks in all flexographic,	21-09(Y)		n	n	y	n	y	y	y	n	n	



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Mondi Akrosil, LLC**

Facility ID:	0123010216
Permit Number:	P0082464
Permit Type:	Renewal
Issued:	3/16/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Mondi Akrosil, LLC

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Draft Title V Permit
Mondi Akrosil, LLC
Permit Number: P0082464
Facility ID: 0123010216

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0123010216
Facility Description: Paper, Coated and Laminated: n.e.c.
Application Number(s): A0012769, A0041597
Permit Number: P0082464
Permit Description: Title V Renewal permit for continuous web paper coating lines with emissions captured with a permanent total enclosure (PTE) and controlled with a thermal incinerator.
Permit Type: Renewal
Issue Date: 3/16/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0082463

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

Mondi Akrosil, LLC
3165 Wilson Road
Lancaster, OH 43130

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Title V Permit
Mondi Akrosil, LLC
Permit Number: P0082464
Facility ID: 0123010216
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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Central District Office unless otherwise specified.

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

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

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

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

4. Risk Management Plans

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

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible 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 paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Central 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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Central District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms



and conditions with which there has been continuous compliance throughout the year are not separately identified.

- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

23. Title VI Provisions

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

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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

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

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

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

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



Draft Title V Permit
Mondi Akrosil, LLC
Permit Number: P0082464
Facility ID: 0123010216

Effective Date: To be entered upon final issuance

30. Submitting Documents Required by this Permit

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



Draft Title V Permit
Mondi Akrosil, LLC
Permit Number: P0082464
Facility ID: 0123010216
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



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

a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJ – National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating:

K001 and K002.

The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://efcr.gpoaccess.gov> (<http://efcr.gpoaccess.gov/>) or by contacting Ohio EPA, Central District Office.

3. The following emissions units contained in the permit are subject to 40 CFR Part 63, Subpart KK – National Emission Standards for the Printing and Publishing Industry:

K002 and K004.

The complete MACT requirements including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://efcr.gpoaccess.gov> or by contacting Ohio EPA, Central District Office.

4. The following emissions units contained in the permit are subject to 40 CFR Part 60, Subpart RR – Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations:

K001 and K002.

The complete NSPS requirements including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://efcr.gpoaccess.gov> or by contacting Ohio EPA, Central District Office.

5. The following emissions units contained in the permit are subject to 40 CFR Part 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters:

a) Affected Sources:

- (1) According to 63.7485, 63.7490 and 63.7499, emissions unit B001 is an existing affected source located at a major source subject to the requirements for a boiler designed to burn natural gas with a heat input less than 10 MMBtu. These are affected sources under the final Boiler MACT rule promulgated on March 21, 2011 as amended on January 31, 2013 (40 CFR Part 63, Subpart DDDDD) subject to work practice standards specified in 40 CFR 63.7540 with a compliance date of January 31, 2016. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://efcr.gpoaccess.gov> (<http://efcr.gpoaccess.gov/>) or by contacting Ohio EPA, Central District Office.

b) Applicable Emission Limitations and /or Control Requirements

63.7500(a)(1) and Table 3	Work practice standards required
63.7500(a)(3)	Operating and maintaining source
63.7500(b)	Approval or alternative work practice standards
63.7565 and Table 10	General Provisions

c) Operational Restrictions

63.7510(e)	Initial compliance demonstration date
63.7515(e)	Biennial tune-up work practice every 25 months

d) Monitoring and Recordkeeping Requirements

63.7540(a)(11) and (12)	Compliance demonstration for work practice standards
63.7555(a)	Records retention
63.7560	Record format and retention

e) Reporting Requirements

63.7530(d)	Reserved
63.7530(e)	Notification of Compliance Status for energy assessment
63.7530(f)	Notification of Compliance Status for initial compliance demonstration requirements
63.7545(a)	Submit notifications to delegated authority
63.7545(b)	Initial Notification date for existing sources
63.7545(e)	Notification of Compliance Statue report date and content
63.7545(f)	Notification of alternative fuel use
63.7550 and Table 9	Reporting schedule and content



63.7495(d)	Comply by submitting notifications according to schedule
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f) Miscellaneous Requirements

63.7490	What is an affected source?
63.7495(b)	When do I have to comply with this subpart?
63.7575	Definitions for this subpart

6. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

- a) B001 – 5 MMBtu/hr natural gas fired boiler. (PTI No. 01-1764, issued May 4, 1988, Placed on registration August 11, 1989);
- b) T001 – 8000 gallon storage tank. (PTI No. 01-1764, issued May 4, 1988, Placed on registration August 11, 1989); and
- c) T002 – 8000 gallon storage tank. (PTI No. 01-1764, issued May 4, 1988, Placed on registration August 11, 1989).



Draft Title V Permit
Mondi Akrosil, LLC
Permit Number: P0082464
Facility ID: 0123010216
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K001, Coater 41

Operations, Property and/or Equipment Description:

Coating line for the application of solvent and non-solvent silicone to a paper web. The line consists of one fully enclosed coating station and two thermal ovens. Emissions are captured with a permanent total enclosure (PTE) and controlled with a thermal incinerator.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 01-7334, as issued 7/22/1998)	Emissions shall not exceed: 30.08 lbs/hr of volatile organic compounds (VOC) from coating operations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-21-09(B)(6), and 40 CFR Part 60, Subpart RR. See b)(2)a, b)(2)b., b)(2)c. and b)(2)d. below.
b.	OAC rule 3745-31-05(D) (PTI 01-7334, as issued 7/22/1998. Synthetic minor to avoid PSD)	VOC emissions from coating usage in emissions unit K001 shall not exceed 100.3 TPY, as a rolling, 12-month summation. VOC emissions from cleanup usage in emissions unit K001 shall not exceed 6.0 TPY, as a rolling, 12-month summation. See c)(1) and c)(2) below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(F)(1)	Solvent based coatings, as applied, that are vented to the thermal oxidizer shall meet the capture and control requirements. See b)(2)b.
d.	OAC rule 3745-21-09(F)(1)	Non-solvent based coatings that are not vented to the thermal oxidizer, as applied in the coating operations, shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. See d)(1).
e.	40 CFR Part 60, Subpart RR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations)	The control efficiency requirements specified by this rule is less stringent than control efficiency requirements established pursuant to OAC rule 3475-31-05(A)(3). 0.20 kg VOC/kg of coating solids applied, for non-solvent based coatings that are not vented to the thermal oxidizer. See b)(2)e.
f.	40 CFR Part 63, Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating)	Emissions from the application non-compliant coatings shall meet the following capture and control measures: The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture efficiency accomplished through the use of a permanent total enclosure. Emissions from the application compliant coatings shall meet the following emissions limitation: The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average See b)(2)f.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A	See b)(2)g.
h.	40 CFR Part 64 (Compliance Assurance Monitoring)	Pursuant to 40 CFR 64.2(b)(i), CAM does not apply to the MACT emission limitations for HAPs or standards in 40 CFR Part 63, Subpart JJJJ, after the compliance date in that rule.

(2) Additional Terms and Conditions

- a. The thermal incinerator serving this emissions unit shall operate with a minimum control efficiency of 95%, by weight. All of the VOC emissions from this emissions unit shall be vented to the thermal incinerator that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

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

- b. The capture and control system shall provide not less than an 81 % reduction, by weight, in the overall VOC emissions from the coating line and the control efficiency of the thermal oxidizer shall not be less than 95 %, by weight, for the VOC emissions vented to it.

[Authority for term: OAC rule 3745-21-09(B)(6) and OAC rule 3745-31-05(A)(3)]

- c. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all volatile organic compound emissions are captured, contained, and directed to the control device.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR 51, Appendix M, Method 204]

- d. Except where employing only compliant materials, all of the VOC emissions from this emissions unit shall be vented to the/a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

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

- e. The complete NSPS 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 Ohio EPA, Northeast District Office, Division of Air Pollution Control. The applicable requirements are listed in d)(10), e)(3) and f)(1)e below.



60.440	Applicability and designation of affected facility
60.441	Definitions and symbols
60.442	Emission standards for VOC

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart RR]

- f. The complete 40 CFR Part 63 Subpart JJJJ MACT 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 Ohio EPA, Central District Office, Division of Air Pollution Control. The applicable requirements are listed in c)(4), d)(11), e)(5), f)(1)(f) and f)(2) below.

63.3280	What is in this Subpart
63.3300	Compliance deadline for affected emission sources
63.3310	Definitions
63.3320	Organic HAP emission limitations
63.3340 and Table 2	Applicable 40 CFR Part 63 Subpart A General Provisions

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

- g. Table 2 to Subpart JJJJ of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart JJJJ of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

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

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit shall not exceed 625,100 gallons based upon a rolling, 12-month summation of the coating usage figures.

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

- (2) The maximum annual cleanup material usage for this emissions unit shall not exceed 2,070 gallons, based upon a rolling, 12-month summation of the cleanup material usage rates.

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

- (3) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H₂O), whenever the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and 40 CFR 51, Appendix M, Method 204]

- (4) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3321(a) and Table 1	What operating limits must be met
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
63.3370(n)	Compliance using combinations of capture and control systems
63.3370(o)	Compliance with intermittently controlled and never-controlled work stations

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information daily for both compliant and non-compliant coatings (solvent and non-solvent based) for emissions unit K001:

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

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

(2) The permittee shall collect and record the following information each month for both compliant and non-compliant coatings (solvent and non-solvent based) for emissions unit K001:

- a. the name and identification number or each each coating and cleanup material, as applied;
- b. the number of gallons for each coating and cleanup material, excluding water and exempt solvents, as applied;
- c. the VOC content for each coating and cleanup material, in pounds of VOC per gallon, excluding water and exempt solvents, as applied;
- d. the rolling, 12-month summation of the each coating and cleanup material usage, in gallons, excluding water and exempt solvents;
- e. the total VOC emissions rate for all coating and cleanup materials used, in pounds per month (b x c); and
- f. the total VOC emissions rate for all coating and cleanup materials used, in tons per rolling, 12-month summation (c x d x 0.0005).

[Authority for term: OAC rule 3745-31-05(D), OAC rule 3745-21-09(F), and OAC rule 3745-77-07(A)(1)]

- (3) If cleanup materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:
- a. the amount of cleanup material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered cleanup material is maintained by weight and VOC content in percent by weight);
 - b. the VOC content of the recovered cleanup material shall be based on the lowest VOC content of any cleanup material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste solvent is shipped;
 - c. the total VOC content (in pounds per month) of the recovered material shall be determined by multiplying total amount recovered times the VOC content of the the recovered cleanup material [d)(2)a. x d)(2)b.].
 - d. the date the recovered cleanup material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and

*A daily log may be required for recovered waste cleanup solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

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

- (4) The permittee shall collect and record the following information monthly for all non-solvent based coatings employed in this emissions unit to demonstrate compliance with 40 CFR Part 60, Subpart RR:
- a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in kg/kg of coating solids, as applied;
 - c. the weight fraction of VOC in each coating;
 - d. the weight fraction of solids in each coating;
 - e. the total mass of each coating, in kgs; and
 - f. the mass-weighted average VOC content for all the coatings employed, in kg/kg of coating solids, calculated in accordance with the equation in section 60.443(a)(2) of Subpart RR.

If the VOC content of each non-solvent based coating employed during the calendar month does not exceed 0.20 kg of VOC/kg of solids, the permittee has demonstrated compliance with the VOC content limitation for that month and is not required to calculate the mass-weighted VOC content for all the coatings employed during the calendar month.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart RR]

- (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.

[Authority for term: OAC rule 3745-31-05(A)(3) and 40 CFR 51, Appendix M, Method 204]

- (6) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and
- b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR 51, Appendix M, Method 204]

- (7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be 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.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart RR, and 40 CFR Part 63, Subpart JJJJ]

- (8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer 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 ± 1 percent of the temperature being measured or ± 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 permittee shall collect and record the following information each day the thermal oxidizer is required to demonstrate compliance with the VOC limitation contained in this permit:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer 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 or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

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

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(I)(i) & (ii), OAC rule 3745-21-09(B)(3)(n), OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart RR, and 40 CFR Part 63, Subpart JJJJ]

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

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;



- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(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 a minor permit modification.

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

- (10) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

60.443(a)	Calculating monthly weighted average of mass of solvent per mass of coating solids for non-solvent based coatings (uncontrolled)
60.443(b) and (d)	Requirement is less stringent than OAC rule 3745-31-05(A)(3)
60.443(d)	Thermal incinerator temperature monitoring
60.445(a)	Maintaining monthly record of coating use and VOC content
60.445(e)	Thermal incinerator temperature monitoring



60.445(g)	Permanent total enclosure operation monitoring
60.445(h)	Record retention

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

- (11) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for 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 parametric monitoring for oxidizer
63.3350(f)	Site-specific capture system monitoring plan requirements
63.3410	Record keeping

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

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's, eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following for emissions unit K001:
- a. the VOC content of the coating and cleanup material, in lbs of VOC per gallon;
 - b. the rolling, 12-month coating material usage;
 - c. the rolling, 12-month cleanup material usage;
 - d. the rolling, 12-month coating VOC limitation;
 - e. the rolling, 12-month cleanup material VOC limitation;
 - f. all three-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 of 0.007 inches of water;
 - g. all three-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 of 0.007 inches of water;
 - h. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature



maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

- i. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
- j. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(D), and OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

60.447(a)	Performance test data and results reporting
60.447(b)	Quarterly or semi-annual exceedance reporting
60.447(c) and 60.7(c)	Thermal Incinerator temperature deviation reporting

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

- (4) The permittee shall notify the Director (Ohio EPA, Central District Office) in writing of any daily record showing that the VOC content of any non-solvent based coating exceeded the applicable limitation of 0.20 kg per kg of coating solids as applied.

The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 30 days following the end of the calendar month in which the excursion(s) occurred.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

- (5) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3400(a)	General requirement to submit notifications and reports
63.3400(b)	Initial Notification Requirements
63.3400(c)	Semi-annual compliance report requirements

63.3400(d)	Notification of Performance Test requirements
63,3400(e)	Notification of Compliance Status requirements
63.3400(f)	Performance test report requirement
63.3400(g)	Startup, shutdown and malfunction report requirements

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

f) Testing Requirements

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

a. Emission Limitation:

30.08 lbs/hr of volatile organic compounds (VOC) from coating operations.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(1) above.

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

b. Emission Limitation:

VOC emissions from coating usage in emissions unit K001 shall not exceed 100.3 TPY, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(1) above.

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

c. Emission Limitation:

VOC emissions from cleanup usage in emissions unit K001 shall not exceed 6.0 TPY, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(2) above.

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



d. Emissions Limitation:

Non-solvent based coatings that are not vented to the thermal oxidizer, as applied in the coating operations, shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(1) above.

[Authority for term: OAC rule 3745-21-09(F) and OAC rule 3745-77-07(A)(1)]

e. Emission Limitation:

0.20 kilogram of VOC per kilogram of coating solids, as applied, when employing non-solvent based coatings that are not vented to the thermal oxidizer

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(10) and the applicable parts of 40 CFR Part 60, Subpart RR.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

f. Emission Limitation:

The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture efficiency accomplished through the use of a permanent total enclosure).

Applicable Compliance Method:

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

63.3360(a)(2)	Performance test requirement summary
63.3360(e)	Control device efficiency performance testing
63.3360(b)	Alternate compliance demonstrations for sources using control device to comply with emission limitation
63.3360(e)(1)	Oxidizer control efficiency demonstration
63.3360(e)(2)	Process information required during testing
63.3360(e)(3)	Oxidizer operating temperature requirements

63.3360(f)	Capture efficiency demonstration for permanent total enclosure
63.4700(d)	Notification of Performance Test requirements
63.3400(f)	Performance test report requirements

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

g. Emission Limitation:

The organic HAP emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(1). The organic HAP content, of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(c). The VOC content and coating solids content of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(d).

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

(2) 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 approximately 2.5 years after issuance of the permit (following the effective date for the Title V permit) and within 6 months prior to the permit expiration.
- b. The emissions testing shall be conducted to demonstrate compliance with the overall reduction efficiency limitation and capture efficiency limitation for VOC of 95.0% and 100% respectively.
- c. The following test methods shall be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm;

Method 204 from 40 CFR Part 51 Appendix M; and

Method 2 from 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPAs, Guidelines for Determining Capture Efficiency, dated January 9, 1995. (Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- e. 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 OAC rule 3745-21-10 or an alternative test protocol approved by 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.
- f. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through each natural draft opening.
- g. Method 2 from 40 CFR Part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the [enclosure] through a forced makeup air duct, using Method 2. The facial velocity (FV) shall be calculated using the following equation:

$$FV = (Q_o - Q_i) / A_n$$

where:

Q_o is the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood;

Q_i is the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct, and is equal to zero if there is no forced makeup air into the enclosure; and

A_n is the total area of all natural draft openings in the enclosure.

- h. If the average facial velocity is measured at greater than 500 feet per minute (9,000 m/hr), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average facial velocity is measured at less than 500 feet per minute, the continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration, either by checking the flow or pressure meter(s) or through the use of streamers, smoke tubes, or tracer gases. All closed access doors and windows that are not considered natural draft openings shall also be

checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

- i. The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening:
 - i. the diameter of each natural draft opening;
 - ii. the distance measured from each natural draft opening to each VOC emitting point in the process;
 - iii. the distance measured from each exhaust duct or hood in the enclosure to each natural draft opening;
 - iv. the total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor, and ceiling; and
 - v. the ratio of the total surface area (sum) of all natural draft openings to the total surface area of the permanent total enclosure.
- j. 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 Ohio EPA, Central District Office. 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.
- k. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. 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 Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).
- l. Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.



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Mondi Akrosil, LLC
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Effective Date: To be entered upon final issuance

- m. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-10, OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

- (1) None.

2. K002, Coater 42

Operations, Property and/or Equipment Description:

Coating line for the application of solvent and non-solvent silicone to a paper web. The line consists of one fully enclosed coating station, one partially enclosed coating station, two thermal ovens, and one printer. Solvent silicone coating is limited to only the fully enclosed station. Emissions are captured with a permanent total enclosure (PTE) and controlled with a thermal incinerator.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 01-7334, as issued 7/22/1998)	Emissions shall not exceed: 30.08 lbs/hr of volatile organic compounds (VOC) from coating operations and 6.0 pounds of VOC per hour from the application of inks. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-21-09(F), and 40 CFR Part 60, Subpart RR. See b)(2)a., b)(2)b., b)(2)c. and b)(2)d. below.
b.	OAC rule 3745-31-05(D) (PTI 01-7334, as issued 7/22/1998. Synthetic minor to avoid PSD)	VOC emissions from coating usage in emissions unit K002 shall not exceed 100.3 TPY, as a rolling, 12-month summation. VOC emissions from printing usage in emissions unit K002 shall not exceed 19.71 TPY, as a rolling, 12-month summation. VOC emissions from cleanup usage in

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>emissions unit K002 shall not exceed 6.0 TPY, as a rolling, 12-month summation. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y).</p> <p>See c)(1), c)(2), and c)(3) below.</p>
c.	OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(F)	Solvent based coatings, as applied, that are vented to the thermal oxidizer shall meet the capture and control requirements identified below.
d.	OAC rule 3745-21-09(F)(1)	Non-solvent based coatings that are not vented to the thermal oxidizer, as applied in the coating operations, shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.
e.	OAC rule 3745-21-09(Y)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3475-31-05(D).
f.	40 CFR Part 60, Subpart RR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations)	<p>The control efficiency requirements specified by this rule is less stringent than control efficiency requirements established pursuant to OAC rule 3475-31-05(A)(3).</p> <p>0.20 kg VOC/kg of coating solids applied, for non-solvent based coatings that are not vented to the thermal oxidizer.</p> <p>See b)(2)e.</p>
g.	40 CFR Part 63, Subpart KK (National Emission Standards for Hazardous Air Pollutants: Printing and Publishing Industry)	<p>In accordance with §63.820, this emissions unit contains an existing wide web flexographic printer located at a major source of HAP. The emissions unit is exempt from the subpart according to §63.821(a)(2)(i).</p> <p>See b)(2)f.</p>
h.	40 CFR Part 63, Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating)	<p>Emissions from the application non-compliant coatings shall meet the following capture and control measures:</p> <p>The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>efficiency accomplished through the use of a permanent total enclosure.</p> <p>Emissions from the application compliant coatings shall meet the following emissions limitation:</p> <p>The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.</p> <p>See b)(2)g.</p>
i.	40 CFR Part 63, Subpart A	See b)(2)h.
j.	40 CFR Part 64 (Compliance Assurance Monitoring)	Pursuant to 40 CFR 64.2(b)(i), CAM does not apply to the MACT emission limitations for HAPs or standards in 40 CFR Part 63, Subpart JJJJ, after the compliance date in that rule.

(2) Additional Terms and Conditions

- a. The thermal incinerator serving this emissions unit shall operate with a minimum control efficiency of 95%, by weight. All of the VOC emissions from this emissions unit shall be vented to the thermal incinerator that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

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

- b. The capture and control system shall provide not less than an 81 % reduction, by weight, in the overall VOC emissions from the coating line and the control efficiency of the thermal oxidizer shall not be less than 95 %, by weight, for the VOC emissions vented to it.

[Authority for term: OAC rule 3745-21-09(B)(6) and OAC rule 3745-31-05(A)(3)]

- c. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all volatile organic compound emissions are captured, contained, and directed to the control device.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), and 40 CFR 51, Appendix M, Method 204]



Effective Date: To be entered upon final issuance

- d. Except where employing only compliant materials, all of the VOC emissions from this emissions unit shall be vented to the thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

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

- e. The complete NSPS 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 Ohio EPA, Northeast District Office, Division of Air Pollution Control. The applicable requirements are listed in d)(10), e)(3) and f)(1)g below.

60.440	Applicability and designation of affected facility
60.441	Definitions and symbols
60.442	Emission standards for VOC

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart RR]

- f. This wide-web flexographic press is used primarily for coating, laminating, or other operations and is exempt from the requirement of 40 CFR Part 63, Subpart KK, provided that:

- i. no more than 500 kilograms (882 lbs) per month, of organic HAP, is applied on product and packaging rotogravure or wide-web flexographic printing presses; and
- ii. the records, as required in §63.829(e)(2), are maintained.

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

- g. The complete 40 CFR Part 63 Subpart JJJJ MACT 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 Ohio EPA, Central District Office, Division of Air Pollution Control. The applicable requirements are listed in c)(5), d)(11), e)(5), f)(1)(h) and f)(2) below.

63.3280	What is in this Subpart
63.3300	Compliance deadline for affected emission sources
63.3310	Definitions
63.3320	Organic HAP emission limitations
63.3340 and Table 2	Applicable 40 CFR Part 63 Subpart A General Provisions

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

- h. Table 2 to Subpart JJJJ of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart JJJJ of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

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

c) Operational Restrictions

- (1) The maximum annual solvent-based coating usage for this emissions unit shall not exceed 625,100 gallons, based upon a rolling, 12-month summation of the solvent-based coating usage rates.

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

- (2) The maximum annual cleanup material usage for this emissions unit shall not exceed 2,070 gallons, based upon a rolling, 12-month summation of the cleanup material usage rates.

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

- (3) The maximum annual ink usage for this emissions unit shall not exceed 19,710 gallons, based upon a rolling, 12-month summation of the ink usage rates.

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

- (4) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H₂O), whenever the emissions unit is in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and 40 CFR 51, Appendix M, Method 204]

- (5) The permittee shall comply with the applicable operational requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3321(a) and Table 1	What operating limits must be met
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
63.3370(n)	Compliance using combinations of capture and control systems
63.3370(o)	Compliance with intermittently controlled and never-controlled work stations

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information daily for both compliant and non-compliant coatings (solvent and non-solvent based) for emissions unit K002:
- a. the name and identification of each coating, printing ink, and cleanup material, as applied;
 - b. the VOC content for each coating, printing ink, and cleanup material in pounds of VOC per gallon of coating and cleanup material, excluding water and exempt solvents, as applied; and

- c. the number of gallons applied, of each coating, printing ink, and cleanup material, excluding water and exempt solvents, as applied.

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

- (2) The permittee shall collect and record the following information each month both compliant and non-compliant coatings (solvent and non-solvent based) for emissions unit K002:

- a. the name and identification number of each coating, printing ink, and cleanup material, as applied;
- b. the number of gallons for each coating, printing ink, and cleanup material, excluding water and exempt solvents, as applied;
- c. the VOC content for each coating, printing ink, and cleanup material, in pounds of VOC per gallon, excluding water and exempt solvents, as applied;
- d. the rolling, 12-month summation of the each coating, printing ink, and cleanup material usage, in gallons, excluding water and exempt solvents;
- e. the total VOC emissions rate for all coating, printing ink, and cleanup materials used, in pounds per month (b x c); and
- f. the total VOC emissions rate for all coating and cleanup materials used, in tons per rolling, 12-month summation (c x d x 0.0005).

[Authority for term: OAC rule 3745-31-05(D), OAC rule 3745-21-09(F), and OAC rule 3745-77-07(A)(1)]

- (3) If cleanup materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:

- a. the amount of cleanup material recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered cleanup material is maintained by weight and VOC content in percent by weight);
- b. the VOC content of the recovered cleanup material shall be based on the lowest VOC content of any cleanup material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste solvent is shipped;
- c. the total VOC content (in pounds per month) of the recovered material shall be determined by multiplying total amount recovered times the VOC content of the the recovered cleanup material [d)(2)a. x d)(2)b.].
- d. the date the recovered cleanup material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and

*A daily log may be required for recovered waste cleanup solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

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

- (4) The permittee shall collect and record the following information monthly for all non-solvent based coatings employed in this emissions unit to demonstrate compliance with 40 CFR Part 60, Subpart RR:
- a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in kg/kg of coating solids, as applied;
 - c. the weight fraction of VOC in each coating;
 - d. the weight fraction of solids in each coating;
 - e. the total mass of each coating, in kgs; and
 - f. the mass-weighted average VOC content for all the coatings employed, in kg/kg of coating solids, calculated in accordance with the equation in section 60.443(a)(2) of Subpart RR.

If the VOC content of each non-solvent based coating employed during the calendar month does not exceed 0.20 kg of VOC/kg of solids, the permittee has demonstrated compliance with the VOC content limitation for that month and is not required to calculate the mass-weighted VOC content for all the coatings employed during the calendar month.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60, Subpart RR]

- (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.

[Authority for term: OAC rule 3745-31-05(A)(3) and 40 CFR 51, Appendix M, Method 204]

- (6) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and
- b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and 40 CFR 51, Appendix M, Method 204]

- (7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be 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.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart RR, and 40 CFR Part 63, Subpart JJJJ]

- (8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer 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 ± 1 percent of the temperature being measured or ± 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 permittee shall collect and record the following information each day the thermal oxidizer is required to demonstrate compliance with the VOC limitation contained in this permit:

- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer 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 or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

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

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(I)(i) & (ii), OAC rule 3745-21-09(B)(3)(n), OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart RR, and 40 CFR Part 63, Subpart JJJJ]

- (9) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Ohio EPA, Central District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(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 a minor permit modification.

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

- (10) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:

60.443(a)	Calculating monthly weighted average of mass of solvent per mass of coating solids for non-solvent based coatings (uncontrolled)
60.443(b) and (d)	Requirement is less stringent than OAC rule 3745-31-05(A)(3)
60.443(d)	Thermal incinerator temperature monitoring
60.445(a)	Maintaining monthly record of coating use and VOC content
60.445(e)	Thermal incinerator temperature monitoring
60.445(g)	Permanent total enclosure operation monitoring
60.445(h)	Record retention

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

- (11) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for 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 parametric monitoring for oxidizer
63.3350(f)	Site-specific capture system monitoring plan requirements
63.3410	Record keeping

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

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's, eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following for emissions unit K002:
 - a. the VOC content of the coating and cleanup material, in lbs of VOC per gallon;
 - b. the rolling, 12-month coating material usage;
 - c. the rolling, 12-month cleanup material usage;
 - d. the rolling, 12-month printing ink usage;
 - e. the rolling, 12-month coating VOC limitation;
 - f. the rolling, 12-month cleanup material VOC limitation;
 - g. all three-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 of 0.007 inches of water;
 - h. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
 - i. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
 - j. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit. The quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C), OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(D), and OAC rule 3745-77-07(A)(3)(c)]

- (3) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 60, Subpart RR, including the applicable parts for the following sections:



60.447(a)	Performance test data and results reporting
60.447(b)	Quarterly or semi-annual exceedance reporting
60.447(c) and 60.7(c)	Thermal Incinerator temperature deviation reporting

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

- (4) The permittee shall notify the Director (Ohio EPA, Central District Office) in writing of any daily record showing that the VOC content of any non-solvent based coating exceeded the applicable limitation of 0.20 kg per kg of coating solids as applied.

The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 30 days following the end of the calendar month in which the excursion(s) occurred.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

- (5) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts for the following sections:

63.3400(a)	General requirement to submit notifications and reports
63.3400(b)	Initial Notification Requirements
63.3400(c)	Semi-annual compliance report requirements
63.3400(d)	Notification of Performance Test requirements
63.3400(e)	Notification of Compliance Status requirements
63.3400(f)	Performance test report requirement
63.3400(g)	Startup, shutdown and malfunction report requirements

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

f) **Testing Requirements**

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

a. Emission Limitation:

30.08 lbs/hr of volatile organic compounds (VOC) from coating operations.

Applicable Compliance Method:



Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(1) above.

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

b. Emission Limitation:

6.0 pounds of VOC per hour from the application of inks.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(1) above.

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

c. Emission Limitation:

VOC emissions from coating usage in emissions unit K002 shall not exceed 100.3 TPY, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(2) above.

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

d. Emission Limitation:

VOC emissions from printing usage in emissions unit K002 shall not exceed 19.71 TPY, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(2) above.

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

e. Emission Limitation:

VOC emissions from cleanup usage in emissions unit K002 shall not exceed 6.0 TPY, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(2) above.

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

f. Emissions Limitation:

Non-solvent based coatings that are not vented to the thermal oxidizer, as applied in the coating operations, shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section d)(1) above.

[Authority for term: OAC rule 3745-21-09(F) and OAC rule 3745-77-07(A)(1)]

g. Emission Limitation:

0.20 kilogram of VOC per kilogram of coating solids, as applied, when employing non-solvent based coatings that are not vented to the thermal oxidizer

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(10) and the applicable parts of 40 CFR Part 60, Subpart RR.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart RR]

h. Emission Limitation:

The organic HAP emissions shall be no more than 5% of the organic HAP applied for each month (95% overall HAP reduction and with a 100% capture efficiency accomplished through the use of a permanent total enclosure).

Applicable Compliance Method:

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

63.3360(a)(2)	Performance test requirement summary
63.3360(e)	Control device efficiency performance testing
63.3360(b)	Alternate compliance demonstrations for sources using control device to comply with emission limitation
63.3360(e)(1)	Oxidizer control efficiency demonstration
63.3360(e)(2)	Process information required during testing
63.3360(e)(3)	Oxidizer operating temperature requirements



63.3360(f)	Capture efficiency demonstration for permanent total enclosure
63.4700(d)	Notification of Performance Test requirements
63.3400(f)	Performance test report requirements

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

i. Emission Limitation:

The organic HAP emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(1). The organic HAP content, of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(c). The VOC content and coating solids content of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(d).

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

(2) 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 approximately 2.5 years after issuance of the permit (following the effective date for the Title V permit) and within 6 months prior to the permit expiration.
- b. The emissions testing shall be conducted to demonstrate compliance with the overall reduction efficiency limitation and capture efficiency limitation for VOC of 95.0% and 100% respectively.
- c. The following test methods shall be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm;

Method 204 from 40 CFR Part 51 Appendix M; and

Method 2 from 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA, Central District Office.

- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPAs, Guidelines for Determining Capture Efficiency, dated January 9, 1995. (Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- e. 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 OAC rule 3745-21-10 or an alternative test protocol approved by 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.
- f. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through each natural draft opening.
- g. Method 2 from 40 CFR Part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the [enclosure] through a forced makeup air duct, using Method 2. The facial velocity (FV) shall be calculated using the following equation:

$$FV = (Q_o - Q_i) / A_n$$

where:

Q_o is the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood;

Q_i is the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct, and is equal to zero if there is no forced makeup air into the enclosure; and

A_n is the total area of all natural draft openings in the enclosure.

- h. If the average facial velocity is measured at greater than 500 feet per minute (9,000 m/hr), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average facial velocity is measured at less than 500 feet per minute, the continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration, either by checking the flow or pressure meter(s) or through the use of streamers, smoke tubes, or tracer gases. All closed access doors and windows that are not considered natural draft openings shall also be

checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

- i. The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening:
 - i. the diameter of each natural draft opening;
 - ii. the distance measured from each natural draft opening to each VOC emitting point in the process;
 - iii. the distance measured from each exhaust duct or hood in the enclosure to each natural draft opening;
 - iv. the total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor, and ceiling; and
 - v. the ratio of the total surface area (sum) of all natural draft openings to the total surface area of the permanent total enclosure.
- j. 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 Ohio EPA, Central District Office. 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.
- k. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to Ohio EPA, Central District Office. 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 Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).
- l. Personnel from Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- m. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from Ohio EPA, Central District Office.



Draft Title V Permit
Mondi Akrosil, LLC
Permit Number: P0082464
Facility ID: 0123010216

Effective Date: To be entered upon final issuance

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-10, OAC rule 3745-77-07(C)(1), and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

- (1) None.

3. K004, Extruder 43

Operations, Property and/or Equipment Description:

Paper coating line including a printer, two extrusion laminators, and three corona treaters.

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) See b)(1)i., d)(1), d)(2), d)(3), d)(4), and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 01-12108, as issued 10/23/2007)	Emissions shall not exceed 9.21 lbs/hr of ozone (O ³) and 40.3 tons per year from corona treatment operations.
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	Emissions shall not exceed: 56 lb/hr of particulate matter (PM) and 2.46 tons per year from extrusion laminators (Units No.1 and No.2). 78 lb/hr of volatile organic compounds (VOC) and 7.79 tons per year from printing operations and extrusion laminators (Units No.1 and No.2). See b)(2)a. below.
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 PM and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b. below.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(A)	PE emissions from the stack shall not exceed 6.19 pounds per hour based on Table I.
f.	OAC rule 3745-21-09(F)	See b)(2)c. below.
g.	OAC rule 3745-21-09(Y)(2)(b)	See b)(2)d. below.
h.	40 CFR Part 63, Subpart KK (National Emission Standards for Hazardous Air Pollutants: Printing and Publishing Industry)	In accordance with §63.820, this emissions unit contains an existing wide web flexographic printer located at a major source of HAP. The emissions unit is exempt from the subpart according to §63.821(a)(2)(i). See b)(2)e.
i.	ORC 3704.03(F) (Toxic Air Contaminants)	See d)(1), d)(2),d)(3),d)(4), and e)(2).

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit 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).

[OAC rule 3745-31-05(A)(3)]
- b. 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.

[OAC rule 3745-31-05(A)(3)]
- c. The maximum VOC content shall not exceed 2.9 pounds VOC per gallon of coating, excluding water and exempt solvents.

[Authority for term: OAC rule 3745-21-09(F) and OAC rule 3745-77-07(C)(1)]
- d. The requirements of OAC rule 3745-21-09(Y) shall not apply provided the total maximum usage of coating and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at this facility is less than or equal to one hundred forty-eight tons per year.

[Authority for term: OAC rule 3745-21-09(Y) and OAC rule 3745-77-07(C)(1)]
- e. This wide-web flexographic press is used primarily for coating, laminating, or other operations and is exempt from the requirement of 40 CFR Part 63, Subpart KK, provided that:



- i. no more than 500 kilograms (882 lbs) per month, of organic HAP, is applied on product and packaging rotogravure or wide-web flexographic printing presses; and
- ii. the records, as required in §63.829(e)(2), are maintained.

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

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permit-to-install (PTI) application for this emissions unit, K004, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days



per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: 2 - butoxyethanol

TLV (mg/m³): 96.66

Maximum Hourly Emission Rate (lbs/hr): 1.197

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 690.7

MAGLC (ug/m³): 2301.5

The permittee, has demonstrated that emissions of 2 - butoxyethanol, from emissions unit(s) K004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (2) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC

3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (3) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (4) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's, eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
 - a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s); and
 - d. a summary of the results of the updated modeling, including the input changes; and
 - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01] and Option A, Engineering Guide #70

f) Testing Requirements

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

a. Emission Limitation

9.21 lbs/hr of ozone (O³) and 40.3 tons per year from corona treatment operations

Applicable Compliance Method

Compliance may be demonstrated with the emission factor as submitted by the applicant. The emission factor of 9.21 lbs/hr of ozone (O³) was obtained from manufacturer's data, as submitted with the permit to install application.



The annual limit is based upon the hourly emissions limitation times the maximum operating schedule of 8,760 hours per year, divided by 2,000 lbs per ton.

$$(9.21 \text{ lb O}_3 / \text{hr}) \times (8760 \text{ hr/yr}) \times (1 \text{ ton} / 2000 \text{ lbs}) = 40.3 \text{ TPY}$$

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

b. Emission Limitation:

0.56 lb/hr of particulate matter (PM) and 2.46 tons per year from Extrusion Laminators (Units No.1 and No.2)

Applicable Compliance Method:

Compliance may be demonstrated with the emissions factors as submitted by the applicant. The emissions factors of 0.257 lb/hr of particulate matter (PM) and 0.303 lb/hr of PM from extrusion laminators No. 1 and No. 2 was obtained from manufacturer's data, as submitted with the permit to install application.

The annual limit is based upon the hourly emissions limitation times the maximum operating schedule of 8,760 hours per year, divided by 2,000 lbs per ton.

Extrusion Laminators

Unit No.1

$$(0.257 \text{ lb PM /hr}) \times (8760 \text{ hr/yr}) \times (1 \text{ ton} / 2000 \text{ lbs}) = 1.13 \text{ tons PM/yr}$$

Unit No.2

$$(0.303 \text{ lb PM /hr}) \times (8760 \text{ hr/yr}) \times (1 \text{ ton} / 2000 \text{ lbs}) = 1.13 \text{ tons PM/yr}$$

Total Emissions from Extrusion Laminators (Units No.1 and No.2)

$$(0.257 \text{ lb PM /hr}) + (0.303 \text{ lb PM /hr}) = 0.56 \text{ lb PM /hr}$$

$$(1.13 \text{ tons PM/yr}) + (1.13 \text{ tons PM/yr}) = 2.46 \text{ tons PM/yr}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.

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

c. Emission Limitation:

1.78 lbs/hr of volatile organic compounds (VOC) and 7.79 tons per year from printing operations and extrusion laminators (Units No.1 and No.2).



Applicable Compliance Method:

Compliance may be demonstrated with the emissions factors as submitted by the applicant. The emissions factors of 1.43 lbs/hr of volatile organic compounds (VOC) from printing and 0.363 lb/hr of VOC from extrusion laminators No. 1 and No. 2 was obtained from manufacturer's data, as submitted with the permit to install application.

The annual limit is based upon the hourly emissions limitation times the maximum operating schedule of 8,760 hours per year, divided by 2,000 lbs per ton.

Extrusion Laminators

Unit No.1 and No.2

$$(0.363 \text{ lb VOC/hr}) \times (8760 \text{ hr/yr}) \times (1 \text{ ton} / 2000 \text{ lbs}) = 1.59 \text{ tons VOC/yr}$$

Printer

$$(1.43 \text{ lbs VOC /gal}) \times (0.99 \text{ gal/hr}) = 1.416 \text{ lbs VOC/hr}$$

$$(1.416 \text{ lbs VOC/hr}) \times (8760 \text{ hr/yr}) \times (1 \text{ ton} / 2000 \text{ lbs}) = 6.20 \text{ tons VOC/yr}$$

Total VOC Emissions from Printing Operations and Extrusion Laminators (Units No.1 and No.2)

$$(0.363 \text{ lb VOC/hr}) + (1.416 \text{ lbs VOC/hr}) = 1.78 \text{ lbs VOC/hr}$$

$$(1.59 \text{ tons VOC/yr}) + (6.20 \text{ tons VOC/yr}) = 7.79 \text{ tons VOC/yr}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 5.

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

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-07(A) and OAC rule 3745-77-07(C)(1)]



d. Emission Limitation:

PE emissions from the stack shall not exceed 6.19 pound per hour based on OAC rule 3745-17-11(A), Table I.

Applicable Compliance Method:

The emission limitation is established pursuant to the requirement specified in OAC rule 3745-17-11(A). Per Table I, the calculated SIP allowable rate is:

$$E = 4.10(P)^{0.67}$$

where P is process weight rate following within the range $0.05 \text{ tons/hr} < P < 30 \text{ tons/hr}$.

$$P = 1.85 \text{ tons/hr}$$

$$E = 6.19 \text{ lbs/hr.}$$

[Authority for term: OAC rule 3745-17-11 and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



4. Emissions Unit Group -Chemical Mixing: P001,P002,

EU ID	Operations, Property and/or Equipment Description
P001	Chemical mixing (preparation) room for coating lines 41 and 42.
P002	Chemical Mixing Room For Coater 42.

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)b., d)(2), d)(3), d)(4), d)(5) and e)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 01-7334, as issued July 22, 1998)	Emissions shall not exceed: <u>P001</u> 40 lbs/day organic compounds (OC) and 7.3 TPY. <u>P002</u> 40 lbs/day organic compounds (OC) and 7.3 TPY. See c)(2)a. and c)(2)b.
b.	ORC 3704.03(F) (Toxic Air Contaminants)	See d)(2), d)(3), d)(4), d)(5) and e)(4).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum annual solvent-based coating mix production for P001 shall not exceed 1,250,200 gallons.

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

- (2) The maximum organic compound content of the solvent-based coatings produced in P001 shall not exceed 6.4 pounds of organic compounds per gallon as a daily volume-weighted average.

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each day for the coating operation at P001 and P002:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material, in pounds per gallon; and
 - d. the total uncontrolled organic compound emission rate for all coatings and cleanup materials, in pound per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

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

- (2) The PTI application for these emissions units, P001 and P002, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m³): 188,000

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 1,710

MAGLC (ug/m³): 4,476

Toxic Contaminant: naptha

TLV (mg/m³): 52,000

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 180

MAGLC (ug/m³): 1,238

Toxic Contaminant: xylene

TLV (mg/m³): 434,000

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 180

MAGLC (ug/m³): 10,333



Toxic Contaminant: methanol

TLV (mg/m³): 262,000

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 2,721

MAGLC (ug/m³): 6,238

The permittee, has demonstrated that emissions of Toluene, Naptha, Xylene, and Methanol, from emissions units P001 and P002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions units or their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through Ohio EPA's, eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the total controlled organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day;



- b. an identification of each day during which the maximum organic compound content of the solvent-based coatings produced in P001 exceeded 6.4 pounds of organic compounds per gallon as a daily volume-weighted average; and
- c. in the 4th quarter report only, specify the total solvent-based coating mix production, in gallons, from P001 for the previous calendar year.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

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

- (3) The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

- (4) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
 - a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s); and
 - d. a summary of the results of the updated modeling, including the input changes; and
 - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions units, or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

f) **Testing Requirements**

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



a. Emission Limitation:

P001 and P002

40 lbs/day OC and 7.3 TPY OC.

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated with the records required in section d)(1).

In accordance with OAC rule 3745-21-10, U.S. EPA Method 24 shall be used to determine the OC content of coatings and cleanup materials, where formulation data is not based on the same method or if it is determined to be necessary by the Director.

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use U.S. EPA Method 24 to determine the VOC contents of the 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 so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

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

g) Miscellaneous Requirements

(1) None.