



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

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

CERTIFIED MAIL

Application No: 16-02041

DATE: 8/3/2000

Kapco
Perry Riggerbach
1000 Cherry St
Kent, OH 44240

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

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

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA
WV

ARAQMD
PA

Akron Metro Area Trans Study



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 16-02041

Application Number: 16-02041
APS Premise Number: 1667040151
Permit Fee: **To be entered upon final issuance**
Name of Facility: Kapco
Person to Contact: Perry Riggenbach
Address: 1000 Cherry St
Kent, OH 44240

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1000 Cherry St
Kent, Ohio**

Description of proposed emissions unit(s):
Two (2) reverse roll coating lines producing PSTL stock.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

Kapco

Facility ID: 1667040151

PTI Application: 16-02041

Issued: To be entered upon final issuance

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

Kapco

Facility ID: 1667040151

PTI Application: 16-02041

Issued: To be entered upon final issuance

lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance

Kapco

Facility ID: 1667040151

PTI Application: 16-02041

Issued: To be entered upon final issuance

that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after

Kapco

PTI Application: 16-02041

Issued: To be entered upon final issuance

Facility ID: 1667040151

commencing operation of the emissions unit(s) covered by this permit.

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Facility ID: 1667040151

PTI Application: 16-02041

Issued: To be entered upon final issuance

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant
VOC

Tons Per Year
6.79

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Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - one 60 inch reverse roll coating head, one four-zone gas-fired curing oven, and an ultra-violet curing tunnel - paper coating line.	OAC rule 3745-31-05(A)(3)	1.03 pounds of volatile organic compounds (VOC) per hour for coatings and cleanup materials
		4.51 tons of VOC per year for coatings and cleanup materials
		The input of VOC for all the coating lines used to manufacture pressure sensitive tape and label materials at this facility shall be limited to 6.79 tons or less per 12 month period.
		2.9 pounds VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(F)	See A.2.a below.
	40 CFR Part 60, subpart RR	See A.2.a below.

2. Additional Terms and Conditions

- 2.a The emission limitation based on this applicable rule is equivalent to or less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

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Issued: To be entered upon final issuance

None

Emissions Unit ID: **K001**

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Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for all the coating lines used to manufacture pressure sensitive tape and label materials at this facility:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon or weight fraction;
 - c. the number of gallons or pounds of each coating and cleanup material employed; and
 - d. the VOC input, in tons per month (i.e., the sum of (b) times (c) for each coating plus the sum of (b) times (c) for each cleanup material, then divided by 2000).

2. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon or weight fraction;
 - c. the number of gallons or pounds of each coating and cleanup material employed;
 - d. the total VOC emission rate for all coatings and cleanup materials, in pounds per month (i.e., the sum of (b) times (c) for each coating plus the sum of (b) times (c) for each cleanup material);
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

4. The permit to install for this emissions unit (K001) was evaluated based on the actual materials

Emissions Unit ID: **K001**

(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: vinyl acetate

TLV (mg/m³): 35

Maximum Hourly Emission Rate (lbs/hr): 1.55*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 513.0

MAGLC (ug/m³): 833.33

* The maximum hourly emission rate is the emission rates from emissions units K001 and K002 combined.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which includes an identification of each month during which the average hourly VOC emissions from the coatings and cleanup materials exceeded 1.03 pounds per hour, and the actual average hourly VOC emissions for each such month.
3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall also submit annual reports which specify the annual VOC input for all the coating lines used to manufacture pressure sensitive tape and label materials at this facility for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. This emissions unit is subject to the applicable provisions of the New Source Performance

Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and

Akron Regional Air Quality Management District
146 S. High Street Suite 904
Akron, OH 44308

6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2 of this permit.

E. Testing Requirements

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

1.a Emission Limitation:

2.9 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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PTI /

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

Compliance with the emission limitation shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used 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 USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

1.b Emission Limitation:

1.03 pounds of VOC per hour for coatings and cleanup materials

4.51 tons of VOC per year for coatings and cleanup materials

Kapc

PTI /

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance with the emission limitations shall be determined through record keeping of the coating and the cleanup material usage, VOC content of each coating and cleanup material, and operating hours per month as required in section C.3 of the terms and conditions of this permit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the cleanup materials.

1.c Emission Limitation:

The input of VOC for all the coating lines used to manufacture pressure sensitive tape and label materials at this facility shall be limited to 6.79 tons or less per 12 month period.

Applicable Compliance Method:

Compliance with the emission limitation shall be determined through record keeping of the coating and the cleanup material usage and VOC content of each coating and cleanup material as required in section C.1 of the terms and conditions of this permit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the cleanup materials.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - one 30 inch reverse roll coating head and two three zone electric ovens - paper coating line.	OAC rule 3745-31-05(A)(3)	0.52 pound of volatile organic compounds (VOC) per hour for coatings and cleanup materials
		2.28 tons of VOC per year for coatings and cleanup materials
		The input of VOC for all the coating lines used to manufacture pressure sensitive tape and label materials at this facility shall be limited to 6.79 tons or less per 12 month period.
		2.9 pounds VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(F)	See A.2.a below.
	40 CFR Part 60, subpart RR	See A.2.a below.

2. Additional Terms and Conditions

- 2.a The emission limitation based on this applicable rule is equivalent to or less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. Operational Restrictions

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PTI /

Issued: To be entered upon final issuance

Emissions Unit ID: **K002**

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for all the coating lines used to manufacture pressure sensitive tape and label materials at this facility:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon or weight fraction;
 - c. the number of gallons or pounds of each coating and cleanup material employed; and
 - d. the VOC input, in tons per month (i.e., the sum of (b) times (c) for each coating plus the sum of (b) times (c) for each cleanup material, then divided by 2000).

2. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon or weight fraction;
 - c. the number of gallons or pounds of each coating and cleanup material employed;
 - d. the total VOC emission rate for all coatings and cleanup materials, in pounds per month (i.e., the sum of (b) times (c) for each coating plus the sum of (b) times (c) for each cleanup material);
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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PTI /

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

4. The permit to install for this emissions unit (K002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: vinyl acetate

TLV (mg/m³): 35

Maximum Hourly Emission Rate (lbs/hr): 1.55*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 513.0

MAGLC (ug/m³): 833.33

* The maximum hourly emission rate is the emission rates from emissions units K001 and K002 combined.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in

Emissions Unit ID: **K002**

an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which includes an identification of each month during which the average hourly VOC emissions from the coatings and cleanup materials exceeded 0.52 pound per hour, and the actual average hourly VOC emissions for each such month.
3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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PTI /

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

4. The permittee shall also submit annual reports which specify the annual VOC input for all the coating lines used to manufacture pressure sensitive tape and label materials at this facility for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. This emissions unit is subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and

Akron Regional Air Quality Management District
146 S. High Street Suite 904
Akron, OH 44308

- 6. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2 of this permit.

E. Testing Requirements

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

- 1.a Emission Limitation:

2.9 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the emission limitation shall be based upon the record keeping requirements specified in Section C.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used 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 USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Kapc
PTI /
Issued: To be entered upon final issuance

Emissions Unit ID: **K002**

Kapc

PTI /

Emissions Unit ID: **K002**

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1.b Emission Limitation:

0.52 pound of VOC per hour for coatings and cleanup materials

2.28 tons of VOC per year for coatings and cleanup materials

Applicable Compliance Method:

Compliance with the emission limitations shall be determined through record keeping of the coating and the cleanup material usage, VOC content of each coating and cleanup material, and operating hours per month as required in section C.3 of the terms and conditions of this permit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the cleanup materials.

1.c Emission Limitation:

The input of VOC for all the coating lines used to manufacture pressure sensitive tape and label materials at this facility shall be limited to 6.79 tons or less per 12 month period.

Applicable Compliance Method:

Compliance with the emission limitation shall be determined through record keeping of the coating and the cleanup material usage and VOC content of each coating and cleanup material as required in section C.1 of the terms and conditions of this permit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the cleanup materials.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 16-02041 Facility ID: 1667040151

FACILITY NAME Kapco

FACILITY DESCRIPTION Two (2) reverse roll coating lines producing PSTL stock. CITY/TWP Kent

SIC CODE 2750 SCC CODE 4-02-013-01 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION one 60 inch reverse roll coating head, one four-zone gas-fired curing oven, and an ultra-violet curing tunnel - paper coating line.

DATE INSTALLED 10/96

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds			1.45	1.03	4.51
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? 40 CFR Part 60, subpart RR NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
2.9 lbs of VOC per gallon of coating, excluding water and exempt solvents (rule based)

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: vinyl acetate

NEW SOURCE REVIEW FORM B

PTI Number: 16-02041

Facility ID: 1667040151

FACILITY NAME Kapco

FACILITY DESCRIPTION Two (2) reverse roll coating lines

CITY/TWP Kent

Emissions Unit ID: **K002**

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **ENTER PTI NUMBER HERE**

- A. Source Description
- B. Facility Emissions and Attainment Status
- C. Source Emissions
- D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS
Pollutant Tons Per Year

NEW SOURCE REVIEW FORM B

PTI Number: 16-02041

Facility ID: 1667040151

FACILITY NAME Kapco

FACILITY DESCRIPTION Two (2) reverse roll coating lines

CITY/TWP Kent

Emissions Unit ID: **K002**

VOC

6.79