Ohio Environmental Protection Agency

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

Certified Mail

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

4/11/2016

Mr. Paul Krueger
Sonoco Flexible Packaging Co Inc
706 South Avenue
Franklin, OH 45005

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1483040077
Permit Number: P0119988
Permit Type: OAC Chapter 3745-31 Modification
County: Warren

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: U.S. EPA
SWOAQA; Indiana; Kentucky

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Sonoco Flexible Packaging Co Inc

Facility ID:	1483040077
Permit Number:	P0119988
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	4/11/2016
Effective:	4/11/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Sonoco Flexible Packaging Co Inc

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Authorization

Facility ID:	1483040077
Facility Description:	Product flexible packaging printing facility.
Application Number(s):	A0054902
Permit Number:	P0119988
Permit Description:	Chapter 31 Modification to incorporate increased VOC content of coatings.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$400.00
Issue Date:	4/11/2016
Effective Date:	4/11/2016

This document constitutes issuance to:

Sonoco Flexible Packaging Co Inc
708 South Avenue
Franklin, OH 45005

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

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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119988
Permit Description: Chapter 31 Modification to incorporate increased VOC content of coatings.

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

Emissions Unit ID:	**K008**
Company Equipment ID:	Black Clawson Extruder-Laminator
Superseded Permit Number:	14-05095
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K010**
Company Equipment ID:	Combi Laminator
Superseded Permit Number:	14-05095
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Southwest Ohio Air Quality Agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Southwest Ohio Air Quality Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theSouthwest Ohio Air Quality Agencyin accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Southwest Ohio Air Quality Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Southwest Ohio Air Quality 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Southwest Ohio Air Quality 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, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

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

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.

C. Emissions Unit Terms and Conditions

1. K008, Black Clawson Extruder-Laminator

Operations, Property and/or Equipment Description:

Black Clawson 2-station extruder/laminator with permanent total enclosure and catalytic oxidizer

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

(1) 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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) June 30, 2008	Organic HAP emissions shall not exceed 5 percent of the organic HAP applied for each month. See b)(2)a.
b.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) National Emission Standards for the Paper and other Web Coating Industry In accordance with 40 CFR 63.3290, this emissions unit is an existing web coating line located at an existing facility that is a major source of HAP.	Organic HAP emissions shall not exceed 5 percent of the organic HAP applied for each month. See c)(7), d)(6), e)(4), and f)(3).
c.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 15 and 40 CFR 63.3340)	Table 2 to 40 CFR Part 63, Subpart JJJJ-Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-31-05(F) Voluntary limitations	VOC emissions from coatings employed in this emissions unit shall not exceed 20.76 tons per rolling, 12-month period. VOC emissions from the cleanup materials employed in this emissions unit

		shall not exceed 4.21 tons per rolling, 12-month period. See b)(2)a. – b)(2)d., c)(1) – c)(6), d)(1) – d)(5) and f)(1)b. – f)(1)d.
e.	OAC rule 3745-21-09(F)(1)	The minimum overall control efficiency specified by this rule is less stringent than the minimum overall control efficiency established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall operate an emissions capture system (permanent total enclosure) at a minimum capture efficiency of 100 percent and a control device (catalytic oxidizer) at a minimum overall control efficiency of 98% for VOC emissions. This control efficiency is more stringent than the control efficiency pursuant to 40 CFR Part 63, Subpart JJJJ and is a voluntary restriction requested by the permittee.

b. 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 VOC emissions are captured, contained, and directed to the catalytic oxidizer.

c. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

ED = (4 area/π) 0.5

ii. The total area of all natural draft openings (AN) shall not exceed 5 percent of the total surface area of the enclosure (AT), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

NEAR = AN / AT

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in "ii.", shall be completely closed to any air movement during process operations.

v. All VOC emissions shall be captured and contained for discharge through the control device.

d. The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

c) Operational Restrictions

(1) The maximum coatings usage for this emissions unit shall be as follows:

a. Adhesives: 205,000 gallons per rolling, 12-month period;

b. Curing Agents/Catalysts: 4,100 gallons per rolling, 12-month period; and

c. Thinner: 173,000 gallons per rolling, 12-month period (excluding cleanup solvent).

(2) The maximum cleanup solvent usage for this emissions unit shall not exceed 1,400 gallons per rolling, 12-month period.

(3) The maximum VOC content for coatings and cleanup material used in this emissions unit shall be as follows:

a. Adhesives: 3.67 pounds per gallon (lbs./gal);

b. Curing Agents/Catalysts: 6.05 lbs./gal;

c. Thinner: 7.51 lbs./gal; and

d. Cleanup Material: 7.51 lbs. /gal.

(4) The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit controlled by the catalytic oxidizer is in operation, shall not be less than the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.

(5) 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), as a 3-hour average, whenever the emissions unit is in operation.

(6) The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst, as determined in an annual catalyst activity test, shall be sufficient to meet the destruction efficiency and control efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(7) See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) for applicable operational requirements.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, calibrate, operate and maintain a temperature monitoring device equipped with a continuous recorder. All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly. The device shall be capable of monitoring temperature with an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius or +/- 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

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

a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than the average temperature during the most recent performance test which demonstrated the emissions unit to be in compliance; and

b. A log or record of downtime or bypass of the control device and/or monitoring equipment when the associated emissions unit was in operation.

(2) The permittee shall install, operate, and maintain monitoring device(s) 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 or bypass of the capture (collection) system and/or monitoring equipment when the emissions unit was in operation.

(3) 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.

(4) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:

a. the name and identification number of each adhesive, curing agent/catalyst, and thinner as applied;

b. the VOC content of each adhesive, curing agent/catalyst, and thinner as applied, in pounds per gallon;

c. the number of gallons of each adhesive, curing agent/catalyst, and thinner employed;

d. the uncontrolled VOC emissions from all adhesives, curing agents/catalysts, and thinners applied, i.e., the summation of the products of "b" x "c";

e. the overall control efficiency determined for the catalytic oxidizer during the most recent demonstration of compliance;

f. the total controlled VOC emissions from all adhesives, curing agents/catalysts, and thinners applied, i.e., "d" x "e", in pounds. This total shall be converted to tons by dividing the total coating VOC emissions by 2000 pounds per ton;

g. the updated rolling, 12-month summation of total VOC emissions from coatings, in tons. This shall include the information for the current month and the preceding eleven calendar months;

h. the name and identification of each cleanup material employed;

i. the VOC content of each cleanup material, in pounds per gallon;

j. the number of gallons of each cleanup material employed;

k. the total VOC emissions from all cleanup materials employed, i.e., the summation of the products of "i" x "j", in pounds. This total shall be converted to tons by dividing the total cleanup VOC emissions by 2000 pounds per ton ; and

l. the updated rolling, 12-month summation of total VOC emissions from cleanup materials, in tons. This shall include the information for the current month and the preceding eleven calendar months.

(5) The permittee shall perform a preventative maintenance inspection of the catalytic oxidizer on an annual basis to evaluate the performance of the catalyst bed. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. During each annual inspection a sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test. The permittee shall maintain a record of the results of each annual inspection and the results of each annual catalyst activity test.

The permittee shall also perform weekly inspections of the external integrity of the catalytic oxidizer. Records shall be maintained of the inspections and the date(s) of catalyst replacement, and if only partial, the amount or percent of the total catalyst replaced.

(6) See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) for applicable monitoring and/or recordkeeping requirements.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed were less than the average temperature established during the most recent performance test that demonstrated the emissions unit was in compliance;

b. 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, as a 3-hour average;

c. any records of downtime or bypass (date and length of time) of the capture (collection) system, the catalytic oxidizer, and/or the monitoring equipment when the emissions unit was in operation;

d. any exceedance of the VOC emission limitations specified in b)(1)d.; and

e. any exceedance of the operational usage and VOC content restrictions specified in c)(1) – c)(3).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) The permittee shall submit annual reports that specify the results of the annual catalyst activity test required in f)(2) for the previous calendar year along with a summary of the results of the annual inspection of the internal integrity of the catalytic oxidizer. The reports shall be submitted by January 31 of each year.

(4) See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) for applicable reporting requirements.

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:

The permittee shall operate an emissions capture system (permanent total enclosure) at a minimum capture efficiency of 100 percent and a control device (catalytic oxidizer) at a minimum overall control efficiency of 98% for VOC emissions.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 6 months after issuance of this permit, unless otherwise approved by Southwest Ohio Air Quality Agency to coincide with the required periodic testing pursuant to the terms and conditions for this emissions unit contained in the permittee's Title V Operating Permit.

ii. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations forVOCs and HAPs.

iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates and control efficiencies:

(a) Method 1-4, and Method 25 (hourly and control efficiency); and

(b) Method 204 (capture efficiency).

The control efficiency shall be determined using Method 25 and the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, unless otherwise specified in 40 CFR 63.827.

Alternative U.S. EPA approved test methods may be used with prior approval from U.S. EPA and Ohio EPA, as appropriate.

iv. The test(s) shall be conducted while the emissions unit is operating at normal operating conditions pursuant to 40 CFR 63.827(d). Process information and control device operating parameters shall be recorded during the test as specified in 63.827(d)(2) and 63.827(d)(3).

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

vi. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

vii. 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 the appropriate Ohio EPA District Office or local air agency 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 the appropriate Ohio EPA District Office or local air agency.

b. Operational Restrictions:

The maximum coatings usage for this emissions unit shall be as follows:

i. Adhesives: 205,000 gallons per rolling, 12-month period;

ii. Curing Agents/Catalysts: 4,100 gallons per rolling, 12-month period; and

iii. Thinner: 173,000 gallons per rolling, 12-month period (excluding cleanup solvent).

The maximum cleanup solvent usage for this emissions unit shall not exceed 1,400 gallons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the operational restrictions shall be demonstrated by the recordkeeping in d)(4).

c. Operational Restrictions:

The maximum VOC content for coatings and cleanup material used in this emissions unit shall be as follows:

i. Adhesives: 3.67 pounds per gallon (lbs. /gal);

ii. Curing Agents/Catalysts: 6.05 lbs. /gal;

iii. Thinner: 7.51 lbs. /gal; and

iv. Cleanup Material: 7.51 lbs./gal.

Applicable Compliance Method:

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

d. Emissions Limitations:

VOC emissions from coatings employed in this emissions unit shall not exceed 20.76 tons per rolling, 12-month period.

VOC emissions from the cleanup materials employed in this emissions unit shall not exceed 4.21 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the operational restrictions shall be demonstrated by the recordkeeping in d)(4).

(2) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in this permit. An intent to test notification shall not be required for catalyst activity testing. The procedures for the catalyst activity test shall be conducted in accordance with the manufacturer's recommendations and as required by the appropriate test method.

(3) See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) for applicable testing requirements.

g) Miscellaneous Requirements

(1) None.

2. K010, Combi Laminator

Operations, Property and/or Equipment Description:

1-station extruder/laminator with permanent total enclosure and catalytic oxidizer

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

(1) 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.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) June 30, 2008	Organic HAP emissions shall not exceed 5 percent of the organic HAP applied for each month. See b)(2)a.
b.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) National Emission Standards for the Paper and other Web Coating Industry In accordance with 40 CFR 63.3290, this emissions unit is an existing web coating line located at an existing facility that is a major source of HAP.	Organic HAP emissions shall not exceed 5 percent of the organic HAP applied for each month. See c)(7), d)(6), e)(4), and f)(3).
c.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 15 and 40 CFR 63.3340)	Table 2 to 40 CFR Part 63, Subpart JJJJ-Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-31-05(F) Voluntary limitations	VOC emissions from coatings employed in this emissions unit shall not exceed 9.43 tons per rolling, 12-month period. VOC emissions from the cleanup materials employed in this emissions unit shall not exceed 3.89 tons per rolling, 12-

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		month period. See b)(2)a. – b)(2)d., c)(1) – c)(6), d)(1) – d)(5) and f)(1)b. – f)(1)d.
e.	OAC rule 3745-21-09(F)(1)	The minimum overall control efficiency specified by this rule is less stringent than the minimum overall control efficiency established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall operate an emissions capture system (permanent total enclosure) at a minimum capture efficiency of 100 percent and a control device (catalytic oxidizer) at a minimum overall control efficiency of 98% for VOC emissions. This control efficiency is more stringent than the control efficiency pursuant to 40 CFR Part 63, Subpart JJJJ and is a voluntary restriction requested by the permittee.

b. 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 VOC emissions are captured, contained, and directed to the catalytic oxidizer.

c. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)\ 0.5$$

ii. The total area of all natural draft openings (AN) shall not exceed 5 percent of the total surface area of the enclosure (AT), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = AN / AT$$

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in "ii.", shall be completely closed to any air movement during process operations.

v. All VOC emissions shall be captured and contained for discharge through the control device.

d. The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

c) Operational Restrictions

(1) The maximum coatings usage for this emissions unit shall be as follows:

a. Adhesives: 93,150 gallons per rolling, 12-month period;

b. Curing Agents/Catalysts: 1,863 gallons per rolling, 12-month period; and

c. Thinner: 78,525 gallons per rolling, 12-month period (excluding cleanup solvent).

(2) The maximum cleanup solvent usage for this emissions unit shall not exceed 1,295 gallons per rolling, 12-month period.

(3) The maximum VOC content for coatings and cleanup material used in this emissions unit shall be as follows:

a. Adhesives: 3.67 pounds per gallon (lbs./gal);

b. Curing Agents/Catalysts: 6.05 lbs./gal;

c. Thinner: 7.51 lbs./gal; and

d. Cleanup Material: 7.51 lbs. /gal.

(4) The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit controlled by the catalytic oxidizer is in operation, shall not be less than the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.

(5) 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), as a 3-hour average, whenever the emissions unit is in operation.

(6) The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst, as determined in an annual catalyst activity test, shall be sufficient to meet the destruction efficiency and control efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(7) See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) for applicable operational requirements.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, calibrate, operate and maintain a temperature monitoring device equipped with a continuous recorder. All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly. The device shall be capable of monitoring temperature with an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius or +/- 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

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

a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was less than the average temperature during the most recent performance test which demonstrated the emissions unit to be in compliance; and

b. A log or record of downtime or bypass of the control device and/or monitoring equipment when the associated emissions unit was in operation.

(2) The permittee shall install, operate, and maintain monitoring device(s) 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 or bypass of the capture (collection) system and/or monitoring equipment when the emissions unit was in operation.

(3) 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.

(4) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:

a. the name and identification number of each adhesive, curing agent/catalyst, and thinner as applied;

b. the VOC content of each adhesive, curing agent/catalyst, and thinner as applied, in pounds per gallon;

c. the number of gallons of each adhesive, curing agent/catalyst, and thinner employed;

d. the uncontrolled VOC emissions from all adhesives, curing agents/catalysts, and thinners applied, i.e., the summation of the products of "b" x "c";

e. the overall control efficiency determined for the catalytic oxidizer during the most recent demonstration of compliance;

f. the total controlled VOC emissions from all adhesives, curing agents/catalysts, and thinners applied, i.e., "d" x "e", in pounds. This total shall be converted to tons by dividing the total coating VOC emissions by 2000 pounds per ton;

g. the updated rolling, 12-month summation of total VOC emissions from coatings, in tons. This shall include the information for the current month and the preceding eleven calendar months;

h. the name and identification of each cleanup material employed;

i. the VOC content of each cleanup material, in pounds per gallon;

j. the number of gallons of each cleanup material employed;

k. the total VOC emissions from all cleanup materials employed, i.e., the summation of the products of "i" x "j", in pounds. This total shall be converted to tons by dividing the total cleanup VOC emissions by 2000 pounds per ton ; and

l. the updated rolling, 12-month summation of total VOC emissions from cleanup materials, in tons. This shall include the information for the current month and the preceding eleven calendar months.

(5) The permittee shall perform a preventative maintenance inspection of the catalytic oxidizer on an annual basis to evaluate the performance of the catalyst bed. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. During each annual inspection a sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test. The permittee shall maintain a record of the results of each annual inspection and the results of each annual catalyst activity test.

The permittee shall also perform weekly inspections of the external integrity of the catalytic oxidizer. Records shall be maintained of the inspections and the date(s) of catalyst replacement, and if only partial, the amount or percent of the total catalyst replaced.

(6) See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) for applicable monitoring and/or recordkeeping requirements.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed were less than the average temperature established during the most recent performance test that demonstrated the emissions unit was in compliance;

b. 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, as a 3-hour average;

c. any records of downtime or bypass (date and length of time) of the capture (collection) system, the catalytic oxidizer, and/or the monitoring equipment when the emissions unit was in operation;

d. any exceedance of the VOC emission limitations specified in b)(1)d.; and

e. any exceedance of the operational usage and VOC content restrictions specified in c)(1) – c)(3).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) The permittee shall submit annual reports that specify the results of the annual catalyst activity test required in f)(2) for the previous calendar year along with a summary of the results of the annual inspection of the internal integrity of the catalytic oxidizer. The reports shall be submitted by January 31 of each year.

(4) See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) for applicable reporting requirements.

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:

The permittee shall operate an emissions capture system (permanent total enclosure) at a minimum capture efficiency of 100 percent and a control device (catalytic oxidizer) at a minimum overall control efficiency of 98% for VOC emissions.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 6 months after issuance of this permit, unless otherwise approved by Southwest Ohio Air Quality Agency to coincide with the required periodic testing pursuant to the terms and conditions for this emissions unit contained in the permittee's Title V Operating Permit.

ii. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations forVOCs and HAPs.

iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates and control efficiencies:

(a) Method 1-4, and Method 25 (hourly and control efficiency); and

(b) Method 204 (capture efficiency).

The control efficiency shall be determined using Method 25 and the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, unless otherwise specified in 40 CFR 63.827.

Alternative U.S. EPA approved test methods may be used with prior approval from U.S. EPA and Ohio EPA, as appropriate.

iv. The test(s) shall be conducted while the emissions unit is operating at normal operating conditions pursuant to 40 CFR 63.827(d). Process information and control device operating parameters shall be recorded during the test as specified in 63.827(d)(2) and 63.827(d)(3).

v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

vi. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

vii. 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 the appropriate Ohio EPA District Office or local air agency 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 the appropriate Ohio EPA District Office or local air agency.

b. Operational Restrictions:

The maximum coatings usage for this emissions unit shall be as follows:

i. Adhesives: 93,150 gallons per rolling, 12-month period;

ii. Curing Agents/Catalysts: 1,863 gallons per rolling, 12-month period; and

iii. Thinner: 78,525 gallons per rolling, 12-month period (excluding cleanup solvent).

The maximum cleanup solvent usage for this emissions unit shall not exceed 1,295 gallons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the operational restrictions shall be demonstrated by the recordkeeping in d)(4).

c. Operational Restrictions:

The maximum VOC content for coatings and cleanup material used in this emissions unit shall be as follows:

iv. Adhesives: 3.67 pounds per gallon (lbs. /gal);

v. Curing Agents/Catalysts: 6.05 lbs. /gal;

vi. Thinner: 7.51 lbs. /gal; and

vii. Cleanup Material: 7.51 lbs. /gal.

Applicable Compliance Method:

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

d. Emissions Limitations:

VOC emissions from coatings employed in this emissions unit shall not exceed 9.43 tons per rolling, 12-month period.

VOC emissions from the cleanup materials employed in this emissions unit shall not exceed 3.89 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the operational restrictions shall be demonstrated by the recordkeeping in d)(4).

(2) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in this permit. An intent to test notification shall not be required for catalyst activity testing. The procedures for the catalyst activity test shall be conducted in accordance with the manufacturer's recommendations and as required by the appropriate test method.

(3) See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) for applicable testing requirements.

g) Miscellaneous Requirements

(1) None.