



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

6/16/2016

JESSICA HEID
 AMERI-CAL CORP.
 1001 LAKE ROAD
 MEDINA, OH 44256

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1652050083
 Permit Number: P0120269
 Permit Type: Initial Installation
 County: Medina

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Medina County Gazette. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Akron Regional Air Quality Management District
 1867 West Market St.
 Akron, OH 44313

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
 ARAQMD; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Ameri-Cal Corporation operates several paper coating lines at the Lake Road facility in Medina County. Line K001 is controlled with an oxidizer. Line K002 is uncontrolled but uses low VOC coatings.

3. Facility Emissions and Attainment Status:

This facility emits VOC and HAPs from the paper coating lines. The facility's potential to emit is 13 tons toluene (individual HAP), 56 tons combined HAPs, and 56 tons of VOC. The facility desires that allowable facility-wide emissions be limited to 24 tons per year combined HAPs, and 9.9 tons per year of any individual HAP in order to avoid Title V permitting requirements. Potential VOC emissions do not approach Title V thresholds, however Ameri-Cal is requesting a 24.9 ton per year VOC emissions restriction for K002 to avoid additional controls technology required in Ohio Administrative Code 3745-21-09(F). Medina County is marginal non-attainment for ozone.

4. Source Emissions:

Ameri-Cal will limit the emissions from the facility to 9.9 tons per year of any individual HAP and 24 tons per year combined HAPS, as well as limiting VOC emissions from K002 to 24.9 tons per year. A rolling, 12-month summation of the individual HAP, combined HAP, and VOC emissions will ensure federal enforceability. The permit will contain terms and conditions which limit Ameri-Cal to the restrictions identified above.

5. Conclusion:

The terms and conditions in the permit will limit the facility's individual and combined HAPs emissions to less than Title V thresholds. The allowable, individual and combined HAPs emission limitations will be 9.9 tons per year and 24 tons per year, respectively. Additionally, K002 VOC emissions will be limited to 24.9 tons per year. Ameri-Cal shall maintain records summarizing the facility's emissions. Excursion reports will be required of the facility to ensure compliance.

6. Please provide additional notes or comments as necessary:

None.



Permit Strategy Write-Up
AMERI-CAL CORP.
Permit Number: P0120269
Facility ID: 1652050083

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Individual HAP	9.9
Combined HAPs	24
VOCs (K002)	24.9

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Initial Installation
AMERI-CAL CORP.

1001 LAKE ROAD,, MEDINA, OH 44256

ID#:P0120269

Date of Action: 6/16/2016

Permit Desc:Initial installation permit for a paper coating line employing a bar coater. Synthetic minor limitations on HAP usage apply facility-wide. An additional 24.9 ton limit applies to Volatile Organic Compounds used on this line to avoid additional controls required per OAC 3745-21-09(F)..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Kelly Kanoza, Akron Regional Air Quality Management District, 1867 West Market St., Akron, OH 44313. Ph: (330)375-2480



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERI-CAL CORP.**

Facility ID:	1652050083
Permit Number:	P0120269
Permit Type:	Initial Installation
Issued:	6/16/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERI-CAL CORP.

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Draft Permit-to-Install and Operate

AMERI-CAL CORP.

Permit Number: P0120269

Facility ID: 1652050083

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1652050083
Application Number(s): A0053752
Permit Number: P0120269
Permit Description: Initial installation permit for a paper coating line employing a bar coater. Synthetic minor limitations on HAP usage apply facility-wide. An additional 24.9 ton limit applies to Volatile Organic Compounds used on this line to avoid additional controls required per OAC 3745-21-09(F).
Permit Type: Initial Installation
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/16/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

AMERI-CAL CORP.
1001 LAKE ROAD
MEDINA, OH 44256

of a Permit-to-Install and Operate 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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install and Operate

AMERI-CAL CORP.

Permit Number: P0120269

Facility ID: 1652050083

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0120269

Permit Description: Initial installation permit for a paper coating line employing a bar coater. Synthetic minor limitations on HAP usage apply facility-wide. An additional 24.9 ton limit applies to Volatile Organic Compounds used on this line to avoid additional controls required per OAC 3745-21-09(F).

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

Emissions Unit ID:	K002
Company Equipment ID:	K002 Bar Coater
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
AMERI-CAL CORP.
Permit Number: P0120269
Facility ID: 1652050083
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
AMERI-CAL CORP.
Permit Number: P0120269
Facility ID: 1652050083
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) All.
2. In order to avoid Title V major source permitting requirements, Ameri-Cal has requested the following hazardous air pollutant (HAP) limitations:
 - a) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Combined annual emissions from this facility shall not exceed the following limitations, as rolling, 12-month summations: 9.9 tons of any individual HAP and 24 tons of combined hazardous air pollutants (HAPs). See a)(2)a below.

- (2) Additional Terms and Conditions
 - a. These emissions units have been in operation for more than 12 months and, as such, the permittee has existing coating usage and emissions records. Therefore, the permittee does not need to be limited to first year monthly throughput and emission limitations.

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

- (1) Each month, the permittee shall collect and record the following information from the coating lines which employ control equipment for the purpose of calculating the rolling, 12-month HAP emissions:
 - a. The name and identification number of each coating and cleanup material employed, as applied;
 - b. The number of gallons of each coating and cleanup material employed, as applied;
 - c. The individual HAP content of each coating and cleanup material employed, as applied, in pounds per gallon;
 - d. The combined HAPs content of each coating and cleanup material employed, as applied, in pounds per gallon;
 - e. The total, uncontrolled emissions of each individual HAP from each coating and cleanup material employed, as applied, in pounds or tons;
 - f. The total, uncontrolled emissions of combined HAPs from each coating and cleanup material employed, as applied, in pounds or tons;
 - g. The total, uncontrolled emissions of each individual HAP from all coatings and cleanup materials employed, as applied, in pounds or tons;
 - h. The total, uncontrolled emissions of combined HAPs from all coatings and cleanup materials, as applied, in pounds or tons;
 - i. The total, controlled emissions of each individual HAP from all coatings and cleanup materials, as applied, in pounds or tons, to be calculated using:
 - i. The total, uncontrolled emissions of individual HAP ((1)g. above); and
 - ii. The overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
 - j. The total, controlled emissions of combined HAPs from all coatings and cleanup materials, as applied, in pounds or tons, to be calculated using:
 - i. The total, uncontrolled emissions of combined HAPs ((1)h. above); and
 - ii. The overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

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

- (2) Each month, the permittee shall collect and record the following information from the coating lines which do not employ control equipment for the purpose of calculating the rolling, 12-month HAP emissions:
 - a. The name and identification number of each coating and cleanup material employed, as applied;
 - b. The number of gallons of each coating and cleanup material employed, as applied;
 - c. The individual HAP content of each coating and cleanup material employed, as applied, in pounds per gallon;
 - d. The combined HAPs content of each coating and cleanup material employed, as applied, in pounds per gallon;
 - e. The total, uncontrolled emissions of each individual HAP from each coating and cleanup material employed, as applied, in pounds or tons;
 - f. The total, uncontrolled emissions of combined HAPs from each coating and cleanup material employed, as applied, in pounds or tons;
 - g. The total, uncontrolled emissions of each individual HAP from all coatings and cleanup materials employed, as applied, in pounds or tons;
 - h. The total, uncontrolled emissions of combined HAPs from all coatings and cleanup materials, as applied, in pounds or tons;

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

- (3) Each month, the permittee shall collect and record the following information:
 - a. The rolling, 12-month summation of total emissions of each individual HAP from all coatings and cleanup materials, as applied, in pounds or tons (sum of (1)(i) and (2)(g)); and
 - b. The rolling 12-month summation of total combined HAPs emissions from all coatings and cleanup materials, as applied, in pounds or tons (sum of (1)(j) and (2)(h)).

c) Reporting Requirements

- (1) 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 District Office or 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

<u>Emissions unit ID</u>	<u>Term & Condition</u>
Facility-Wide	B.2.a)(1)a.
K002	C.1.a)(1)c.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

d) Testing Requirements

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



a. Emission Limitations:

The total facility-wide HAP emissions shall not exceed the following, as a rolling, 12-month summation:

9.9 tons of any individual HAP; and

24 tons of total combined HAPs.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements in section b)(3) above.

- (2) 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 cleanup materials employed and the individual and combined HAPs contents of the coatings and cleanup materials employed at the facility.



Draft Permit-to-Install and Operate
AMERI-CAL CORP.
Permit Number: P0120269
Facility ID: 1652050083
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K002, Bar Coater

Operations, Property and/or Equipment Description:

Paper coating line - bar coater with electric and gas-fired drying ovens

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(F)	Coatings applied in the coating operations shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average. See c)(1) below.
b.	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	VOC emissions from emissions unit K002 shall not exceed 2.1 tons per month averaged over a 12-month rolling period. See b)(2)a. below.
c.	OAC rule 3745-31-05(D)	VOC emissions from emissions unit K002 shall not exceed 24.9 tons per rolling 12-month period. See b)(2)a. below.

(2) Additional Terms and Conditions

- a. These emissions units have been in operation for more than 12 months and, as such, the permittee has existing coating usage and emissions records. Therefore, the permittee does not need to be limited to first year monthly throughput and emission limitations.

c) Operational Restrictions

(1) The following work practice standards shall be employed for all cleaning materials:

- a. Store all VOC containing cleaning materials and used shop towels in closed containers.
- b. Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.
- c. Minimize spills of VOC-containing cleaning materials.
- d. Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- e. Minimize VOC emission from cleaning of storage, mixing, and conveying equipment.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the coating or printing line and shall maintain this information at the facility for a period of five years:

- a. the name and identification number of each coating, as applied;
- b. the VOC content of each coating, in pounds per gallon excluding water and exempt solvents, as applied;
- c. the volume of each coating employed, in gallons excluding water and exempt solvents, as applied;
- d. the total VOC emissions from all coatings employed, in pounds (the summation of the products of "b" times "c" for all cleanup materials employed);
- e. the total volume of all coatings employed, in gallons excluding water and exempt solvents, as applied (the summation of "c" for all coatings);
- f. the daily volume-weighted average VOC content of all coatings, in pounds per gallon excluding water and exempt solvents, as applied (the quotient of "d" divided by "e").

These daily records shall be maintained for the purpose of determining the daily weighted average VOC content.

- (2) 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 of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total VOC emissions from all cleanup materials, in pounds or tons, (the summation of the products of “b” times “c” for all cleanup materials employed);
 - e. the total VOC emissions from all coatings employed during the month (the summation of the daily VOC emissions from d)(1)e. above)
 - f. the total VOC emissions from all coatings and cleanup materials employed during the current month, in tons (the sum of “d” and “e”);
 - g. the total VOC emissions from all coatings and cleanup materials employed, in tons, for each of the preceding 11 months;
 - h. the rolling 12 month summation of VOC emissions, in tons; and
 - i. the average monthly VOC emissions, in tons (the quotient of “h” divided by 12).

These monthly records shall be maintained for the purpose of determining monthly and annual VOC emissions for the emissions unit.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the calculated daily volume-weighted average VOC content exceeded the applicable pounds of VOC per gallon of coating (excluding water and exempt solvents) limitation. 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 45 days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC emissions shall not exceed 2.9 pounds per gallon of coating, excluding water and exempt solvents as applied.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements in section d)(1) above.

b. Emission Limitations:

VOC emissions from emissions unit K002 shall not exceed 2.1 tons per month as a rolling 12-month average.

VOC emissions from emissions unit K002 shall not exceed 24.9 tons per rolling 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping requirements in section d)(2) above.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.