

Synthetic Minor Determination and/or Netting Determination

Permit To Install 16-02349

A. Source Description

MACtac located in Stow, Ohio, is a facility that manufactures pressure sensitive adhesive products. In October 2001, MACtac was issued a final Title V operating permit for the facility and is considered a major stationary source located in a nonattainment area as of June 15, 2004. MACtac is requesting a permit to install for a new narrow web coating line (Line AR) and to modify its existing D-line coater. The modifications to the D-Line will allow it to take over production that used to be performed on both Lines E and G. The modification involves the replacement of motors, and drives, and the upgrade of the drying/curing ovens. Additionally, this coating line will be tied into the existing catalytic oxidizers so that adhesives, which cannot be recovered by the carbon adsorption system, can be properly treated. Line AR will be a new narrow web coating line that uses low Volatile Organic Compound (VOC)/high solids coatings and ultraviolet (UV) technology for curing.

B. Facility Emissions and Attainment Status

MACtac is located in Summit County, Ohio which is currently being reclassified as nonattainment for ozone. MACtac's potential to emit is greater than 250 tons of VOC per year. Because potential and actual emissions are greater than 250 tons per year, the facility is considered major for nonattainment rule applicability. MACtac has requested that this permit be issued as a netting permit with federally enforceable emission limitations to avoid triggering a major modification under the nonattainment provisions listed in Ohio Administrative Code (OAC) chapter 3745-31 for VOC.

The installation of Line AR and modification of D-Line will result in VOC emissions increase of 187.4 tons per year. In order to achieve a net decrease of VOC emissions and avoid triggering the nonattainment provisions listed in Ohio Administrative Code (OAC) chapter 3745-31, MACtac has taken credit for several emissions units that have been shutdown at the facility and intends to shutdown two additional units as soon as D-Line modifications are complete and is producing salable products. Please refer to the detailed netting tables found in Part II of the Facility Terms and Conditions of this permit. The overall net VOC emission increase will be 29.14 tons per year.

The netting determination was based on using the last two years of 'normal' operation for each emissions unit, but not necessarily based on a contemporaneous time period of the last 5 years. Offset emissions from Lines E and G are calculated using the average of the last two years (2003 and 2002) of operation prior to the requested modification and new source installation. Lines F and L were retired and essentially shut down after 1999, but remained actively permitted in case they were needed to be restarted. Due to the shutdown, offset emissions are calculated based on 1998 and 1999 emissions since that was when those sources were last operated in a 'normal' manner.

C. Source Emissions

D-line is currently connected to a carbon adsorption solvent recovery system, and with the modification will also be connected to existing catalytic oxidizers (2). Line-D will also be modified to include permanent total enclosures on the adhesive and release coating stations to provide for 100% capture of volatiles. D-Line will accept a synthetic VOC limitation of 116.02 tons per year. Line AR is also limiting its potential to emit to 71.3 tons per year to avoid nonattainment provisions listed in OAC chapter 3745-31.

D. Conclusion

The installation of Line AR and modification of D-Line will result in a net increase of VOC emissions of 29.14 tons per year which is less than the VOC significance level of 40 tons per year as specified in OAC chapter 3745-31. Thus the proposed Line AR installation and D-Line modification will "net out" and not trigger a required review of the application under nonattainment provisions listed in OAC chapter 3745-31 regulations. The permit includes federally enforceable limits, operational restrictions, monitoring, and reporting to ensure continual compliance with the requirements that will maintain these levels of emissions.



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
SUMMIT COUNTY

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 16-02349

DATE: 6/17/2004

MACTac Stow
Tim Owens
4560 Darrow Rd
Stow, OH 44224

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$700 will be due. Please do not submit any payment now.

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

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

ARAQMD

Akron Metro Area Trans Study

WV

PA

SUMMIT COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **16-02349** FOR AN AIR CONTAMINANT SOURCE FOR
MACTAC STOW

On 6/17/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **MACTac Stow**, located at **4560 Darrow Rd, Stow, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02349:

Modification to D-Line (K003) and Installation of New Narrow Web Coating Line.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**Permit To Install
Terms and
Conditions**

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

DRAFT PERMIT TO INSTALL 16-02349

Application Number: 16-02349
APS Premise Number: 1677110026
Permit Fee: **To be entered upon final issuance**
Name of Facility: MACtac Stow
Person to Contact: Tim Owens
Address: 4560 Darrow Rd
Stow, OH 44224

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4560 Darrow Rd
Stow, Ohio**

Description of proposed emissions unit(s):
Modification to D-Line (K003) and Installation of New Narrow Web Coating Line.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

MACtac Stow

Facility ID: 1677110026

PTI Application: 16-02349

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. 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.

4. 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.

5. Severability Clause

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

MACtac Stow**Facility ID: 1677110026****PTI Application: 16-02349****Issued: To be entered upon final issuance****6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, 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, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

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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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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 appropriate Ohio EPA District Office or local air 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

MACtac Stow

Facility ID: 1677110026

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3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. 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.

MACtac Stow**Facility ID: 1677110026****PTI Application: 16-02349****Issued: To be entered upon final issuance****B. State Only Enforceable Permit To Install General Terms and Conditions****1. Compliance Requirements**

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

2. Reporting Requirements

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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. Termination of Permit To Install

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

MACtac Stow**Facility ID: 1677110026****PTI Application: 16-02349****Issued: To be entered upon final issuance****5. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

6. 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.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally

MACtac Stow

PTI Application: 16-02340

Issued

Facility ID: 1677110026

Emissions Unit ID: K003

Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit To Install Summary of Allowable Emissions

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	187.4

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MACtac Stow

PTI Application: 16-02349

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Facility ID: 1677110026

MACt

PTI A

Emissions Unit ID: K003

Issued: To be entered upon final issuance**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS****A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

1. This permit to install shall cover the modification of D-Line (K003) and the installation of a new Line AR (K016). The modification of D-Line involves the replacement of motors, and drives and the upgrade of the drying/curing ovens. This coating line will include the installation of a permanent total enclosure and be tied into the existing catalytic oxidizers (2) and the carbon adsorption system. The control system used will depend on the coatings being applied. The new Line AR consists of a narrow web coating line that uses low VOC/high solids coatings and UV technology for curing. Line AR will be an uncontrolled source of emissions.

The modified D-Line will replace production on Lines E (K004) and G (K006). The permittee will permanently shut down those lines once the full production rate of D-Line has been achieved, within a 180-day shakedown period. Coating lines F (K005) and L (K014) were retired from operation after 1999, but remained permitted in case they were needed for future use. These lines will also be permanently shut down.

These shutdowns are required for the purpose of netting out of the nonattainment provisions listed in OAC chapter 3745-31 for volatile organic compounds (VOC) with the installation of the new Line AR and the modification of D-Line. In order to verify that the emissions from these pollutants do not exceed the emissions described in the netting table below during the transition to the D-Line and Line AR, the permittee must comply with the following limitations for the effected emissions units including existing and new/modified emissions units K003 - K006, K014, and K016:

187.3 tons VOC per rolling, 12-month period for K003 - K006, K014, and K016 combined.

Also, MACtac is requesting federally enforceable restrictions on Line AR to limit emissions to 71.3 tons VOC per rolling 12-month period in order to successfully net out of the nonattainment provisions listed in OAC chapter 3745-31. D-Line will be restricted to 116.02 tons VOC per rolling 12-month period as well.

The permittee shall keep sufficient records to demonstrate that these requirements are being met during the transition period.

The following tables include all emissions units at MACtac that are being used to demonstrate a net decrease in VOC emissions for the entire facility. The contemporaneous time period is from 1998 to 2005. The period begins 6 years prior to the start of the construction project (June 2004) in order to emissions from "normal operation." The end of the contemporaneous period is when the project will begin normal operation, which is planned for June 2005.

Table of MACtac Facility VOC Emission Offset in the Six Year Period

Source ID	Source Description	Years of Actual Emissions ⁽¹⁾	Avg 2 Yr Actual Emissions	Potential Emissions After Modification ⁽²⁾	Net Emission Change
K003	D-Line	1999, 2000	35.83	116.02	80.19
K004	Line E	2002, 2003	34.28	0	-34.28
K005	Line F	1998, 1999	37.82	0	-37.82
K006	Line G	2002, 2003	44.39	0	-44.39
K014	Line L	1998, 1999	5.89	0	-5.89
K016	Line AR	n/a	0	71.3	71.33
		TOTALS	158.20	187.32	29.14
PSD Significant Emissions Level					40

⁽¹⁾The two year average of actual emissions are based on the years most representative of "normal operations". All other two year averages of actual emissions are based on the previous two consecutive years. "Normal operations" for each emissions unit identified is defined by MACtac in their PTI application submitted April 2, 2004.

⁽²⁾Potential to emit for D-Line based on a control efficiency of 94%. Line AR potential to emit is based upon obtaining a synthetic emission limitation through this permitting action.

The permittee shall notify Akron RAQMD upon the initiation of production after the modification of D-Line and the construction of Line AR.

2. The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the U.S. EPA, 40 CFR Part 60:

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation</u>
K003	D-Line	RR
K016	Line AR	RR

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

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

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

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MAC1

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: K003

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MACtac Stow

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MAC1

PTI A

Emissions Unit ID: K003

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Reports are to be sent to:

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

and

Akron Regional Air Quality Management District
Room 904
146 South High Street
Akron, OH 44308

3. The permittee's existing emissions units are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ and therefore are subject to all the requirements listed for existing sources pursuant to 40 CFR Part 63, Subpart JJJJ which include, but not limited to, the following:
 - a. 0.2 kg organic HAP per kg coating solids as-applied; or
 - b. 0.04 kg organic HAP per kg coating material, as-applied.
4. The permittee shall achieve total, on-going compliance with all applicable requirements of 40 CFR Part 63, Subpart JJJJ on or before the mandatory compliance date of December 5, 2005. Also, the permittee shall complete any performance test required in paragraph 63.3360 within the time limits specified in paragraph 63.7(a)(2).

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

1. The permit to install for emissions units (K003 and K016) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of their emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

MACtac Stow

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Pollutant: Vinyl Acetate

TLV (mg/m3): 35

Maximum Hourly Emission Rate (lbs/hr): 0.92

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 651.7

MAGLC (ug/m3): 833.3

Pollutant: Acrylic Acid

TLV (mg/m3): 5.9

Maximum Hourly Emission Rate (lbs/hr): 0.178

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 27.4

MAGLC (ug/m3): 140.5

2. Physical changes to or changes in the method of operation of these emissions units after their installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to these emissions units or their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions units will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted,

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change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions units still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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PTI A

Emissions Unit ID: K003

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K003 - Coating Line D - pressure sensitive coating line with permanent total enclosure controlled with catalytic incinerators (2) or carbon adsorption - Modification	OAC rule 3745-31-05(A)(3)	40 CFR Part 60, Subpart RR
		40 CFR Part 63, Subpart KK
		40 CFR Part 63, Subpart JJJ
	OAC rule 3745-21-09(F)	
	OAC rule 3745-21-09(H)	
	OAC rule 3745-31-05(C) (to avoid being a major modification under the nonattainment provisions listed in Chapter 3745-31)	

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<u>Applicable Emissions Limitations/Control Measures</u>	90% overall VOC emission reduction as calculated over a calendar month.
The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-09(F), 3745-31-05(C), 3745-21-09(H), 40 CFR Part 52.1870(c)(123), 40 CFR Part 60, Subpart RR, 40 CFR Part 63, Subpart KK, 40 CFR Part 63, Subpart JJJJ.	exempt See A.II.2 below. 0.2 kg organic HAP per kg coating solids as-applied; or 0.04 kg organic HAP per kg coating material, as-applied.
Volatile organic compound (VOC) emissions shall not exceed 63.5 lbs/hr.	The compliance date for this rule is December 5, 2005.
See A.I.2.d below.	*annual coating and cleanup material usage is based upon a VOC input rate that is equivalent to the annual VOC emission rates and is based upon the following: VOC input rate = (C) X (D) X an overall control efficiency of 94% where C = the number of gallons of each coating and cleanup material employed and D = the VOC content of each coating and clean up material employed in pounds of VOC per gallon of coating and clean up material where 100% of the solvents in the coating and clean up materials employed is emitted.
See A.I.2.a and A.I.2.b below.	
See A.I.2.a and A.I.2.b below.	
Both the annual combined coating and cleanup material usage VOC input rate* and the annual VOC emissions shall not exceed the following as 12-month summations:	
116.02 tpy.	
0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or	

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- 2.a** The requirements of this rule have been replaced by the requirements specified in the facility-specific SIP revision approved by USEPA - Region 5 and promulgated in the Federal Register on April 17, 2001 (see 40 CFR Part 52.1870(c)(123)).
- 2.b** In lieu of the applicable limitations in OAC rules 3745-21-09(F) and 3745-21-09(H), the actual daily emissions of VOC from all of the emissions units K003 through K009, calculated in accordance with section A.III.3, shall comply each day with the facility-wide, daily allowable VOC emission limitation, calculated in accordance with section A.III.2.

The VOC contents of the coating materials shall be determined in accordance with OAC rule 3745-21-10(B) and USEPA Method 24.

- 2.c** Both the annual combined coating and cleanup material usage VOC input rate* and the annual emissions of VOC from this emissions unit shall not exceed 116.02 tons per year, based upon a rolling, 12-month summation of the monthly VOC input rates and VOC emissions, respectively. The permittee has existing coating and cleanup material usage VOC input* records and therefore does not need to be limited to first year monthly coating and cleanup material usage VOC input* amounts.

II. Operational Restrictions

1. For the carbon adsorption system, the average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions units controlled by the carbon adsorption system were in compliance.
2. The permittee shall not employ more than 400 kg per month, for every month, of organic HAP on printing stations.
3. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than the minimum pressure differential (inches of water) established during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.
4. For each catalytic incinerator, the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions units controlled by a catalytic

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incinerator are in operation and employing VOC-containing coatings and cleanup materials, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance.

5. Each catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in each catalytic incinerator, as determined during the annual catalytic activity test, shall be at least 90% at the test temperature equal to that temperature at which the inlet to the catalyst bed is set.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each day for each coating employed in coating lines K003 through K009:
 - a. the name and identification number;
 - b. the VOC content, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
 - c. the volume of coating applied, in gallons of coating, excluding water and exempt solvents;
 - d. the density of the VOC content, in pounds of VOC per gallon of VOC; and
 - e. the line in which the coating is applied, and, if applicable, an identification of any VOC control system to which the coating's VOC emissions are being vented;
 - f. if the control system is a carbon adsorber, record whether the VOC in the coating is recoverable or not recoverable via this control technology.
2. The daily allowable VOC emission limitation for coating lines K003 through K009 shall be calculated in accordance with the following equation and recorded on a daily basis:

$$Ad = (0.67) \text{ SUMMATION } \sum_{i=1}^n \frac{Vi * Li * (D - Ci)}{(D - Li)}$$

where:

Ad = the daily allowable VOC emission limitation for coating lines K003 through K009, in pounds of VOC;

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- n = subscript denoting the total number of coatings employed for the day;
- i = subscript denoting a specific coating;
- V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;
- C = VOC content of each surface coating applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
- D = the density of VOC in each coating applied, in pounds of VOC per gallon of VOC (for the purpose of calculating A_d , a standard density of 7.36 will be used for all coatings); and
- L = the emission limitation for each surface coating applied (this is 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a paper coating, and 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a vinyl coating).

3. The actual daily VOC emissions (E_d) from coating lines K003 through K009 shall be determined in accordance with the following equation and recorded on a daily basis:

$$E_d = \sum_{i=1}^n V_i * C_i * (1 - F_i)$$

where:

- E_d = the actual daily VOC emissions from coating lines K003 through K009, in pounds of VOC;
- n = subscript denoting the total number of coatings employed for the day;
- i = subscript denoting a specific coating;
- V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;
- C = VOC content of each surface coating as applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and
- F = fraction, by weight, of VOC emissions from the coating reduced or prevented from being emitted to the ambient air (this is the overall efficiency of the capture system and control device).

4. The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon

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adsorption system when the emissions units controlled by the carbon adsorption system are in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. a log of the periods of time when the capture (collection) system, control device, and monitoring equipment were not operating and the associated emissions units were in operation; and
 - b. all 3-hour blocks of time (when the emissions units were in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions units were in compliance.
5. The permittee also shall collect and record the following information each day for the carbon adsorption system:
- a. the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds per day (T);
 - b. the rolling, 7-day summation of the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds (T7);
 - c. the amount of VOC recovered by the carbon adsorption system, in pounds per day (VOCrec);
 - d. the rolling, 7-day summation of the amount of VOC recovered by the carbon adsorption system, in pounds (VOCrec,7); and
 - e. the rolling, 7-day average overall, fractional control efficiency of the carbon adsorption system (SRE7).
6. The overall control efficiency of the carbon adsorption system shall be determined each day by directly comparing the input liquid VOC to the recovered liquid VOC. The procedure for use in

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this situation is specified in 40 CFR 60.433 with the following modifications: The permittee shall obtain data each day for the solvent usage and solvent recovery and determine the solvent recovery efficiency of the system each day using a rolling, 7-day period. The recovery efficiency for each day is computed as the ratio of the total recovered solvent for that day and the prior 6 consecutive operating days to the total solvent usage for the same 7-day period used for the recovered solvent, rather than a 30-day weighted average as given in 40 CFR 60.433. This ratio shall be expressed as a percentage. This shall be done within 72 hours following each 24-hour period.

7. The permittee shall maintain records of the total volume and organic HAP content of each material applied in the printing stations during each month.
8. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area(s); and
 - b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
9. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of each catalytic incinerator's catalyst bed when the emissions units controlled with the catalytic incinerators are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day any VOC-containing coatings are employed:
 - a. all 3-hour blocks of time (when any emissions unit was in operation and employing VOC-containing coatings) during which the average temperature of the exhaust gases immediately before any catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance;
 - b. a log of the periods of time when any temperature monitoring device was not operating and the associated emissions unit(s) was/were in operation; and
 - c. a log of the periods of time when any catalytic oxidizer alarm system indicates a malfunction of any catalytic oxidizer or an indication from any catalytic oxidizer fail-safe

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control system that the capacity of any catalytic oxidizer has been exceeded.

10. The permittee shall perform a preventive maintenance inspection of each catalytic incinerator on an annual basis to evaluate the performance of each catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventive maintenance checklist submitted to the Ohio EPA on February 12, 1999, and shall include a physical inspection of each unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations. Repair and replacement of equipment shall be performed as necessitated by the inspection. Samples of catalyst material shall be collected from each catalyst bed to perform the catalyst activity test described in section A.V.3.

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in section A.V.3.

11. The permittee shall calculate the hourly VOC emissions rate by dividing the daily VOC emission rate by the number of hours the emissions unit was in operation.
12. The permittee shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:
- calculate the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data; and
 - calculate the weighted average by the following equation:

$$G = \frac{\text{SUMMATION}_{i=1}^n W_{oi} * M_{ci}}{\text{SUMMATION}_{i=1}^n W_{si} * M_{ci}}$$

13. The permittee shall maintain a calendar month record of all coatings used and the results of the Reference Test Method 24 or manufacturer's formulation data used for determining the VOC content of those coatings.
14. The permittee shall calculate and record the following on a monthly basis for this emissions unit:
- the name and identification of each cleanup material employed;
 - the number of gallons of each cleanup material employed;
 - the VOC content of each cleanup material, in pounds per gallon;
 - the total uncontrolled coating and clean up material usage VOC input amounts* and the

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total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month;

- e. the rolling, 12-month summation of the total coating and cleanup material usage VOC input rate* and the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year; and
- f. the calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

1. In lieu of the applicable reporting requirements in OAC rule 3745-21-09(B)(3), the permittee shall submit quarterly deviation (excursion) reports that identify any daily record that demonstrates a failure to comply with the daily allowable VOC emission limitation calculated each day in accordance with the equation specified in A.III.2.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by the carbon adsorption system were in operation during which the average VOC concentration of the exhaust gases from the carbon adsorption system exceeded the concentration limitation specified in section A.II.1.
3. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by a catalytic incinerator were in operation during which the average temperature of the exhaust gases immediately before any catalyst bed does not comply with the temperature limitation specified in section A.II.4.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record that demonstrates a failure to comply with the hourly allowable VOC emission limitation calculated each day.
6. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of either the rolling, 12-month facility emission limitation for VOC and/or the coating and cleanup material usage VOC input rate*.

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7. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
8. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that more than 400 kg of organic HAP was employed in the printing station. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
9. The permittee shall submit an annual report that includes the results of the annual catalyst activity tests required in section A.V.3. This annual report shall be submitted within 45 days after each catalyst activity test is performed.
10. Following the initial performance test, the permittee shall submit quarterly deviation reports of exceedances of the VOC emission limitations (0.20 kg VOC/kg or 90% reduction). If no exceedances occur during a particular quarter, a report stating this shall be submitted semiannually.
11. The permittee shall also submit annual reports which specify the total VOC emissions from emissions units K003, K004, K005, K006, K014 for the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

facility-wide daily allowable VOC emission limitation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.2 and A.III.3.

- 1.b Emission Limitation:

63.5 lbs/hr volatile organic compounds (VOC)

116.02 tons per year VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements in Section A.III of these T&Cs.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- 1.c Emission Limitation:

0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or

90% overall VOC emission reduction as calculated over a calendar month.

Applicable Compliance Method:

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Compliance shall be demonstrated by the record keeping requirements in terms A.III.12 and A.III.13 and by the stack testing requirements.

After the initial performance test required under section 60.08, compliance with the VOC emission limitation and percentage reduction requirements is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.

Solvent Recovery Device:

- i. performance test shall be a one calendar month test and not the average of three runs as specified in 60.8(f);
- ii. the weighted average mass of VOC per mass of coating solids applied for a one calendar month period shall be determined as specified in sections A.III.12 and A.III.13;

$$G = \frac{\text{SUMMATION}_{i=1}^n W_{oi} * M_{ci}}{\text{SUMMATION}_{i=1}^n W_{si} * M_{ci}}$$

- iii. calculate the required percent overall VOC emission reduction as follows:

$$Rq = (G - 0.20) / (G) * 100$$

If Rq is less than or equal to 90 percent, then the required VOC emission reduction is Rq. If Rq is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

- iv. inventory VOC usage and VOC recovery for a one calendar month period; and
- v. determine the percent overall VOC emission reduction as follows:

$$R = \text{SUMMATION}_{i=1}^n (M_r) / (W_{oi} * M_{ci}) * 100$$

If the R value is equal to or greater than the Rq value, then compliance is

demonstrated.

Catalytic Incinerators:

- i. performance test shall be determined by averaging the results of three test runs as specified in 40 CFR 60.8(f);
- ii. determine prior to each test run the weighted average mass of VOC per mass of coatings solids applied being used at the facility. The weighted average shall be determined as specified in sections A.III.12 and A.III.13. In this application the quantities of W_{oi} , W_{si} , and M_{ci} shall be determined for the time period of each test run and not a calendar month;
- iii. calculate the required percent overall VOC emission reduction as follows:

$$R_q = (G - 0.20) / (G) * 1000$$

If R_q is less than or equal to 90 percent, then the required VOC emission reduction is R_q . If R_q is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

- iv. determine the percent overall VOC reduction of the incinerator(s) by the following equation and procedures:

$$R = \frac{[\text{the summation of } (Q_{bi}) \times (C_{bi}) \text{ from } i = 1 \text{ to } n - \text{the summation of } (Q_{aj}) \times (C_{aj}) \text{ from } j = 1 \text{ to } m]}{[\text{the summation of } (Q_{bi}) \times (C_{bi}) \text{ from } i = 1 \text{ to } n - \text{the summation of } (Q_{ft}) \times (C_{ft}) \text{ from } k = 1 \text{ to } p]} \times 100$$

- (1) the permittee shall construct the overall VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in 40 CFR 60.446(b) (Methods 1-4 and 25);
 - (2) if the value of R is greater than or equal to the value of R_q , then compliance is demonstrated.
2. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted no later than 6 months after permit issuance.
 - b. The emission testing shall be conducted to determine the control efficiency of the carbon adsorption system, the capture efficiency for coating lines vented to the catalytic incinerators (verifying the overall control efficiency of 94%) and the carbon adsorption system, and the percent overall VOC emissions reduction of the carbon adsorption system.

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- c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the

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USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

- d. The percent overall VOC emission reduction of the carbon adsorption system shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.433 with a rolling, 7-day average, as specified in section A.III.6.

All testing must follow the requirements of OAC rule 3745-21-10(A).

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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).

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.

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.

3. The permittee shall conduct, or have conducted, an annual catalyst activity test using the catalyst sample(s) collected during the annual preventive maintenance inspection described in section A.III.10. An intent to test notification shall not be required for the testing noted in this section. The procedure for the catalyst activity test shall be in accordance with the document titled "Catalyst Activity Procedures" as submitted to the Ohio EPA on February 18, 1999.

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4. Usage Input Limitation:

116.02 tpy VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.4 of these T&Cs.

VI. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.I through A.V.

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Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Coating Line D - pressure sensitive coating line with permanent total enclosure controlled with catalytic incinerators (2) or carbon adsorption - Modification	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K016 - Line AR - UV narrow web coating line	OAC rule 3745-31-05(A)(3)	40 CFR Part 63, Subpart JJJ
	OAC rule 3745-21-09(F)	
	OAC rule 3745-31-05(C) (to avoid being a major modification under the nonattainment provisions listed in Chapter 3745-31)	
		40 CFR Part 60, Subpart RR

Applicable Emissions
Limitations/Control
Measures

The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-09(F), 3745-31-05(C), 40 CFR Part 60, Subpart RR, 40 CFR Part 63, and 40 CFR Part 63, Subpart JJJJ.

Volatile organic compound (VOC) emissions shall not exceed 18.9 lbs/hr.

2.9 lbs of VOC per gallon of coating

Both the combined annual coating and cleanup material usage VOC input rate* and combined annual VOC emissions shall not exceed the following as 12-month summations:

71.3 tpy.

0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month

0.2 kg organic HAP per kg coating solids as-applied; or

0.04 kg organic HAP per kg coating material, as-applied.

The compliance date for this

rule is December 5, 2005.

*annual coating and cleanup material usage based upon VOC input rate is equivalent to the annual VOC emission rates and is based upon the following: $VOC\ input\ rate = (C) \times (D)$ where C = the number of gallons of each coating and cleanup material employed and D = the VOC content of each coating and clean up material employed in pounds of VOC per gallon of coating and clean up material where 100% of the solvents in the coating and cleanup material employed is emitted.

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Emissions Unit ID: K016

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Both the combined annual coating and cleanup material usage VOC input rate* and the combined annual emissions of VOC from this emissions unit shall not exceed 71.3 tons per year, based upon a rolling, 12-month summation of the monthly coating and cleanup material usage VOC input rates* and VOC emissions, respectively.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the allowable cumulative coating and cleanup material usage VOC input rates* and emissions levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating and Cleanup Material Usage VOC Input Rates and Emissions of VOC (tons)*</u>
1	11.9
1-2	11.9
1-3	23.8
1-4	23.8
1-5	35.7
1-6	35.7
1-7	47.6
1-8	47.6
1-9	59.5
1-10	59.5
1-11	71.3
1-12	71.3

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating and cleanup material usage VOC input rate* limitation and the VOC emission limitation shall be based upon a rolling, 12-month summation of the monthly annual coating and cleanup material usage VOC input rates and VOC emissions, respectively.

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

1. The permittee shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:
 - a. calculate the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data; and

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- b. calculate the weighted average by the following equation:

$$G = \frac{\text{SUMMATION}_{i=1}^n W_{oi} * M_{ci}}{\text{SUMMATION}_{i=1}^n W_{si} * M_{ci}}$$

2. The permittee shall maintain a calendar month record of all coatings used and the results of the Reference Test Method 24 or manufacturer's formulation data used for determining the VOC content of those coatings.
3. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the total VOC emission rate for all coatings and cleanup materials, in pounds per day;
 - d. the total number of hours the emissions unit was in operation; and
 - e. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (c)/(d), in pounds per hour (average).

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

4. The permittee shall calculate and record the following on a monthly basis for this emissions unit:
 - a. the total annual coating and cleanup material usage VOC input amounts* and the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month; and
 - b. the rolling, 12-month summation of the total annual coating and cleanup material usage VOC input rate* and the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year.

IV. Reporting Requirements

Emissions Unit ID: K016

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of either the rolling, 12-month facility emission limitation for VOC and/or annual coating and cleanup material usage VOC input rate* and, for the first 12 calendar months of operation following the issuance of this permit, all exceedance of the maximum allowable cumulative coating and cleanup material usage VOC* input rate levels and VOC emission levels.
2. The permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the average hourly total organic compound emissions exceeded 18.9 pounds per hour, and the actual average hourly organic compound emissions for each such day.
3. The permittee shall submit quarterly deviation reports of exceedances of the VOC emission limitations (0.20 kg VOC/kg or 90% reduction). If no exceedances occur during a particular quarter, a report stating this shall be submitted semiannually.
4. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.
5. The permittee shall also submit annual reports which specify the total VOC emissions from this emission unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

71.3 tpy VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.4 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.
 - b. Emission Limitation:

18.9 lbs/hr VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

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0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.1 & A.III.2 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

d. Usage Input Limitation:

71.3 tpy VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.4 of these T&Cs.

VI. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A.I through A.V.

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K016 - Line AR - UV narrow web coating line	None	None.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None.