



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL

SUMMIT COUNTY

Application No: 16-01717

Fac ID: 1677120065

DATE: 10/3/2006

Derma Med Coatings, LLC

Scott Miller

381 Geneva Avenue

Tallmadge, OH 44278

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely

Michael W. Ahern, Manager

Permit Issuance and Data Management Section

Division of Air Pollution Control

CC: USEPA

ARAQMD



**Permit To Install  
Terms and Conditions**

**Issue Date: 10/3/2006  
Effective Date: 10/3/2006**

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 16-01717**

Application Number: **16-01717**  
APS Premise Number: **1677120065**  
Permit Fee: **\$100**  
Name of Facility: **Derma Med Coatings, LLC Miller**  
Person to Contact: **Scott**  
Address: **381 Geneva Avenue  
Tallmadge, OH 44278**

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**381 Geneva Avenue  
Tallmadge, OHIO**

Description of modification:  
**Administrative mod of PTI 16-01717 issued 11/5/97.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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## **GENERAL PERMIT CONDITIONS**

### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

### **CONSTRUCTION OF NEW SOURCES**

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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### **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.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

### **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.

### **PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION**

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

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.

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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#### **AIR EMISSION SUMMARY**

The air contaminant emissions units listed below comprise the Permit to Install for **Derma Med Coatings, LLC** located in **SUMMIT** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K001	Adhesive coating of continuous paper web-one drying oven, one gravure, and one knife-over roll, roll coaters, winder and unwinder - controlled with regenerative thermal oxidizer	Thermal incinerator	3745-31-05 3745-21-09 (F)	4.8 lbs VOC per gallon of solids 9.23 lbs/hr VOC

#### **SUMMARY TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	40.43

#### **RECORD(S) RETENTION AND AVAILABILITY**

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All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

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### **REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Akron Air Pollution Control, 146 South High Street., Akron, Ohio 44308.**

### **WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Air Pollution Control, 146 South High Street., Akron, Ohio 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

### **AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

### **NINETY DAY OPERATING PERIOD**

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

### **CONSTRUCTION COMPLIANCE CERTIFICATION**

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

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

#### **A. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

#### **B. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day for the coating line and control equipment:
  - a. The name of identification numb of each coating, as applied;
  - b. The number of hours that the emissions unit was in operation;
  - c. The pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - d. The maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - e. The calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content of the daily volume-weighted VOC content recorded in accordance with paragraph (d) 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;
  - f. The calculated average controlled hourly VOC emission rate, in pounds of VOC per hour, as applied. The average controlled hourly VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with the paragraph (d) 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;

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- g. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and ,
- h. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

### **C. Reporting Requirements**

- 1. The permittee shall notify the Director (Akron Air Pollution Control) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Air Pollution Control) within 45 days after the exceedance occurs.
- 2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- 3. The permittee shall notify the Director (Akron Air Pollution Control) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per hour limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Air Pollution Control) within 45 days after the exceedance occurs.

### **D. Testing Requirements**

- 1. Compliance with the emission limitations in Permit to Install No. 16-1717 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation

9.23 pounds/hour VOC

#### Applicable Compliance Method

Compliance with the allowable mass emission rate for VOC shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 25-25A, 40 CFR 51, Appendix

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M, Methods 204-204F and the procedures in OAC rule 3745-21-10 (C).

b. Emission Limitation

4.8 pounds VOC per gallon of solids

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Applicable Compliance Method

Daily records shall be maintained of the VOC content of each coating employed, the daily usage of each coating, and the calculated VOC emission rate in pounds of VOC per gallon of solids. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating employed.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after the issuance of this permit;
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC;
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate:

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 USEPA's "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 requirements.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 (C) or 40 CFR 60, Appendix A, Method 25-25A. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;

- d. The tests shall be conducted while the emission unit is operating at or near its maximum capacity, unless otherwise specified or approved by Akron Air Pollution Control;

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- e. Not later than 30 days prior to the proposed test date (s), the permittee shall submit an "Intent to Test" notification to Akron Air Pollution Control. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating

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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 Akron Air Pollution Control's refusal to accept the results of the emission test (s);

- f. Personnel from Akron Air Pollution Control 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 emission unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and,
- g. A comprehensive written report on the results of the emission test (s) shall be signed by the person or persons responsible for the tests and submitted to Akron Air Pollution Control 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 Akron Air Pollution Control.

### **C. Miscellaneous Requirements**

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 16-1717. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the ethyl acetate, ethanol, and toluene emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emission unit's exhaust, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3.0 model and a comparison of the predicated 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

**Pollutant: Ethyl Acetate**

**TLV (ug/m<sup>3</sup>): 1440**

**Maximum Hourly Emission Rate (pounds/hour): 9.23**

**Predicated 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m<sup>3</sup>): 811.6**

**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 34,285**

**Pollutant: Ethanol**

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**TLV (ug/m<sup>3</sup>): 1880**  
**Maximum Hourly Emission Rate (pounds/hour): 9.23**  
**Predicated 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m<sup>3</sup>): 811.6**  
**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 44,761**

**Pollutant: Toluene**

**TLV (ug/m<sup>3</sup>): 1880**  
**Maximum Hourly Emission Rate (pounds/hour): 9.23**  
**Predicated 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m<sup>3</sup>): 811.6**  
**Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m<sup>3</sup>): 4,476**

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval, including the possible issuance of modification of modifications to PTI number 16-1717 and the operating permit:

- a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 Hygienist (ACGIH), than the lowest TLV value specified in the above table;
- b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decrease stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. Any change to the emissions unit or its method of operation that would either require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01; and,
- d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01 (B) (6)].