



State of Ohio Environmental Protection Agency

U.E.P.A.
S.E.D.O.

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Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

02/23/01

CERTIFIED MAIL

06-79-00-0259

RE: Final Chapter 3745-35 Permit To Operate

Convertapax, Inc.
Joni Mathias
Gundy Drive Bldg. #3
Midvale, OH 44653

Dear Joni Mathias:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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.

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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Southeast District Office at (740) 385-8501.

Very truly yours,

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

cc: Southeast District Office

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 02/23/01

Facility ID: 06-79-00-0259

Expiration Date: 02/23/06

FINAL ISSUE

This document constitutes issuance for:

Convertapax, Inc.
PO Box 540
Gundy Dr. Bldg. #3
Midvale, OH 44653

of a permit to operate for:
K004 (Heat Seal Coating Line)
Rotogravure Adhesive Coating Line with Thermal Incinerator

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

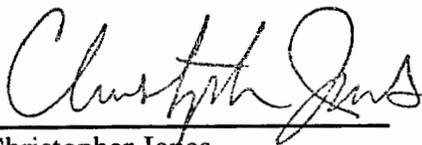
10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Southeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Christopher Jones
Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
rotogravure adhesive coating line with thermal incinerator	OAC rule 3745-31-05 (PTI 06-5925 as modified) OAC rule 3745-21-09(Y)(2)(b)	Emissions of volatile organic compounds (VOC) shall not exceed 11.2 lbs/hr or 49.0 tpy. See section A.2.a below.

2. Additional Terms and Conditions

- 2.a The total maximum usage of coatings and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines at this facility shall not exceed 148 tpy.

B. Operational Restrictions

1. Emissions from the coating line shall be captured and vented to the thermal incinerator. The combustion chamber temperature of the thermal incinerator shall be maintained at 1020 degrees Fahrenheit or greater during operation of this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating employed during the month;
 - b. the VOC content of each coating, as applied, employed during the month, in pounds per gallon;
 - c. the number of gallons of each coating employed during the month;
 - d. the total controlled VOC emissions from all coatings employed during the month (i.e., the sum of C.1.b multiplied by C.1.c for each coating employed, in pounds or tons, multiplied by (1-X), where X is the overall control efficiency of the thermal incinerator (expressed as a decimal) based on the most recent emission test conducted for this emissions unit (currently 0.82));
 - e. the hours of operation for the line during the month;
 - f. the average hourly controlled emission rate (i.e., C.1.d divided by C.1.e).
2. The permittee shall collect and record the total controlled VOC emissions from all coatings for each calendar year (i.e., the summation of the values obtained for C.1.d for each month in the calendar year).
3. The permittee shall collect and record the total usage of coatings, cleanup materials and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines at this facility, in tons.
4. The permittee shall operate and maintain a temperature monitor which measures the thermal incinerator combustion chamber temperature when the coating line is in operation. Units shall be in degrees Fahrenheit. The monitoring device shall be capable of accurately measuring the combustion chamber temperature. The temperature monitor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

C. Monitoring and/or Record Keeping Requirements (continued)

5. The combustion chamber temperature of the thermal incinerator shall be observed and recorded in the operating log for the coating line once during each roll of material coated. For any temperature reading less than 1020 degrees Fahrenheit, the permittee shall also record the reason for the low temperature (if known) and the corrective action(s) taken.

D. Reporting Requirements

1. The permittee shall submit a deviation (excursion) report to the Director (the appropriate Ohio EPA District Office or local air agency) if any record, as required by section C.1 of these terms and conditions, shows an exceedance of the VOC hourly emissions rate. The report shall be submitted within 30 days following the end of the calendar month in which the deviation occurred.
2. The permittee shall submit a deviation (excursion) report to the Director (the appropriate Ohio EPA District Office or local air agency) if any record, as required by section C.2 of these terms and conditions, shows an exceedance of the VOC annual emissions rate. The report shall be submitted by January 31 of the year following the year in which the allowable emissions rate was exceeded.
3. The permittee shall submit deviation (excursion) reports which identify all times during which the observed combustion chamber temperature within the thermal incinerator does not comply with the minimum combustion chamber temperature specified in section B.1 of these terms and conditions.
4. The permittee shall submit a deviation (excursion) report to the Director (the appropriate Ohio EPA District Office or local air agency) if any record, as required by section C.3 of these terms and conditions, shows total usage of coatings, cleanup materials and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines at the facility in excess of 148 tons per year. The report shall be submitted within 30 days following the end of the calendar year in which the deviation occurred.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission limitation:
11.2 pounds of VOC/hour

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping requirements specified in section C.1 of these terms and conditions.

Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC content of the coatings.

If required, emission tests shall be performed using USEPA Method 25 or 18.
 - 1.b Emission Limitation:
49.0 tons of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping requirements specified in section C.2 of these terms and conditions.

Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC content of the coatings.

E. Testing Requirements (continued)

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 90 days after startup, unless the permittee has: (1) provided written notification to the Director (the appropriate Ohio EPA District Office or local air agency) that only water based coatings are being used in this emissions unit, and (2) the permittee has received prior written approval from the Director (the appropriate Ohio EPA District Office or local air agency) to cancel the test.
 - b. The emission testing shall be conducted to demonstrate compliance with the VOC emission limitations.
 - c. Test method 25A of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate(s) for VOC. Incinerator control efficiency shall be determined by dividing the outlet emission rate by the total VOC input rate.
 - d. 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, from the appropriate Ohio EPA District Office or local air agency.

3. Compliance with the coating and inks usage limit in Section A.2.a shall be based upon the record keeping specified in Section C.3.
4. Compliance with the minimum operating temperature restriction for the thermal incinerator shall be determined based on the record keeping specified in Section C.5.

F. Miscellaneous Requirements

None