Facility ID: 1409000859 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

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Part II - Special Terms and Conditions

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

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

   (a) None.

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

   (a) None.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Paper roll stock coater line # 1	OAC rule 3745-31-05 (PTI 14-4199)	See A.2.
	OAC rule 3745-21-09(F)	The emissions limits established by this rule are less stringent than those established pursuant to OAC rule 3745-31-05.

2. **Additional Terms and Conditions**

   (a) The volatile organic compound (VOC) content of each coating employed in emissions units K001 through K003 shall not exceed 0.55 lb/gallon, as applied, including water.
   The VOC content of all of the coatings employed in emissions units K001 through K003 shall not exceed 0.09 lb/gallon, as applied, including water, based on a monthly, volume-weighted average.
   The VOC content of each cleanup material employed in emissions units K001 through K003 shall not exceed 3.5 lbs/gallon of cleanup material.
   The actual emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling 12-month summation.
   The combined VOC emissions from emissions units K001 through K003 shall not exceed 24.75 lbs/hr and 16.44 TPY (including emissions from cleanup material).

   The hourly VOC emissions limit is based on the emissions units' potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit.
   The combined ammonia (NH3) emissions from emissions units K001 through K003 shall not exceed 2.25 lbs/hr and 9.0 TPY.

   The hourly NH3 emissions limit is based on the emissions units' potential to emit. Therefore, no hourly record keeping, reporting or testing is required to demonstrate compliance with this limit.

B. **Operational Restrictions**

1. The combined amount of coatings employed in emissions units K001 through K003 shall not exceed 318,660 gallons per year (including water).

2. The amount of organic cleanup materials employed in this emissions unit shall not exceed 400 gallons per year.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units K001 through K003:

   a. The name and identification number of each coating and cleanup material employed.

   b. The VOC content of each coating (excluding water and exempt solvents), as applied, in lbs of VOC/gallon.

   c. The VOC content of each coating (including water and exempt solvents), as applied, in lbs of VOC/gallon.

   d. The gallons, as applied, of each coating employed.

   e. The gallons of each cleanup material employed.

f. The VOC content of each cleanup material employed, in lbs of VOC/gallon.

g. The total gallons, as applied, of all coatings employed.

h. The total gallons of all cleanup materials employed.

i. The monthly, volume-weighted average VOC content of all of the coatings employed during the calendar month, i.e., the sum of (c) times (d) for each coating employed and divided by (g), in lbs of VOC/gallon.

j. The total VOC emissions, i.e., the sum of (c) times (d) plus (e) times (f) for each coating and cleanup material employed divided by 2000, in tons.

2. The permittee shall collect and record the following information each month for the entire facility:

a. The name and identification number of each coating employed.

b. The individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.

c. The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from (b)).

d. The number of gallons of each coating employed.

e. The name and identification of each cleanup material employed.

f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from (f)).

h. The number of gallons of each cleanup material employed.

i. The total individual HAP usage (emissions) for each HAP from all coatings and cleanup materials employed, in tons per month (for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material and divided by 2000 lbs/ton).

j. The total combined HAP usage (emissions) from all coatings and cleanup materials employed, in tons per month (the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material and divided by 2000 lbs/ton).
k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in tons. This shall include the information for the current month and the preceding eleven calender months.

l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in tons. This shall include the information for the current month and the preceding eleven calender months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).

b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. **Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services of any monthly record which shows the use of noncomplying coatings or cleanup materials (i.e., coatings or cleanup materials exceeding the allowable VOC content limits). A copy of such record shall be sent to the Hamilton County Department of Environmental Services within thirty days following the end of the calendar month.

2. The permittee shall submit annual reports which specify the following for the previous calendar year:

a. The total VOC emissions from emissions units K001 through K003;
b. The total coating usage for emissions units K001 through K003; and
c. The cleanup material usage for each of the emissions unit K001 through K003.

These reports shall be submitted by January 31 of each year.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the HAP emission limitations set forth in this Permit to Operate. The reports shall be submitted in accordance with section 3 of the General Terms and Conditions.

4. The permittee shall also submit annual reports that summarize the actual annual HAP emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emission limitations in Sections A.1. and A.2., and with the material usage and content restrictions in Sections A.2 and B of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitations:
   24.75 lbs/hr and 16.44 TPY of VOC from K001 through K003 (including cleanup)

   Applicable Compliance Method:
   Compliance with the hourly limit shall be determined by multiplying the maximum VOC content in lbs/gal by the maximum hourly coating usage. Compliance with the annual VOC emission limitation shall be determined by the sum of the monthly VOC emission records required pursuant to Section C.1.

   b. Emission Limitations:
   Less than 10 TPY of any single HAP and less than 25 TPY for any combination of HAPs, from emissions units K001 through K003

   Applicable Compliance Method:
   Compliance with the HAP emission limitations shall be based upon the record keeping performed in accordance with Section C.2. of these terms and conditions.

   c. Emission Limitations:
   2.25 lbs/hr and 9.0 TPY of NH3 from emissions units K001 through K003

   Applicable Compliance Method:
   Compliance with the NH3 emission limitations shall be based upon the following formulas:

   Hourly NH3 emission = the maximum NH3 content in lbs/gal x the maximum hourly coating usage in gallons.

   Annual NH3 emission = the sum of the NH3 content in lbs/gal x the annual usage in gallons for each coating and cleanup material, and dividing by 2000 lbs/ton.
   d. Materials Content and Usage Restrictions:
   Materials Content:
   Coatings: 0.55 lb/gal of VOC (each coating) in emissions units K001 through K003 and 0.09 lb/gal based on a monthly, volume-weighted average
   Cleanup: 3.5 lbs/gal of VOC (each cleanup) in emissions units K001 through K003

   Materials Usage Restrictions:
   Coatings: 318,660 gal/yr from emissions units K001 through K003 combined
   Cleanup: 400 gal/yr for each emissions unit

   Applicable Compliance Method:
   Compliance with the VOC content limitations and annual usage restrictions shall be based upon the record keeping performed pursuant to Section C.1. of these terms and conditions.

2. USEPA Method 24 shall be used to determine the VOC content for each coating employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

   Formulation data or USEPA Method 24 shall be used to determine the VOC content of each cleanup material employed.

   Formulation data shall be used to determine the NH3 content of each coating and cleanup material employed.

F. **Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and then the predicted 1-hour maximum ground-level concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

   Pollutant: NH3
   TLV (ug/m3): 17,000
   Maximum Hourly Emission Rate (lbs/hr): 2.45
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 215
   MAGLC (ug/m3): 405

   OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

   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 specified in the above table.
   b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height).

   c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted.

d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31.

b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install.

c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.