State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
TUSCARAWAS COUNTY
Application No: 06-5925

DATE: November 17, 1999

Convertapax, Inc.
Larry Mathias
PO Box 540
Midvale, OH 44653-0540

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, buy 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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. 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

Very truly yours,

Thomas G. Rigo

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

cc: USEPA
DAPC, SEDO

FINAL PERMIT TO INSTALL 06-5925

Application Number:	06-5925
APS Premise Number:	0679000259
Permit Fee:	**$400**
Name of Facility:	Convertapax, Inc.
Person to Contact:	Larry Mathias
Address:	PO Box 540 Midvale, OH 44653-0540

Location of proposed air contaminant source(s) [emissions unit(s)]:
5539 Gundy Drive
Midvale, **Ohio**

Description of proposed emissions unit(s):
ROTOGRAVURE ADHESIVE COATING LINE WITH THERMAL INCINERATOR.

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

Part I - GENERAL TERMS AND CONDITIONS

A. 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 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.)

3. 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 this permit. Such records may be maintained in computerized form.

4. 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 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.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

9. 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 are inadequate 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 prove to be inadequate or cannot meet applicable standards.

10. 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.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. 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.

13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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.

15. 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.

B. 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.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	49.1

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Modification to existing rotogravure adhesive coating line with thermal incinerator	OAC rule 3745-31-05	Emissions of volatile organic compounds (VOC) shall not exceed 11.2 pounds per hour nor 49.0 tons per year. Emissions of any single hazardous air pollutant (HAP) shall not exceed 9.9 tons per 12-month period Emissions of total HAPs shall not exceed 24.9 tons per 12-month period.
	OAC rule 3745-21-09(Y)(2)(b)	See Additional Term and Condition 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 tons per year.

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 any operation of this emissions unit.

C. Monitoring and/or Recordkeeping 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.

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

   c. The number of gallons of each coating employed.

   d. The total uncontrolled VOC emission rate from all coatings employed (i.e., the sum of C.1.b times C.1.c for all of the coatings employed), in pounds or tons.

   e. The total controlled VOC emission rate from all coatings employed (i.e., the sum of C.1.b times C.1.c for all of the coatings employed, in pounds or tons, multiplied by (1-X), where X is the control efficiency of the thermal incinerator (expressed as a decimal) based on the most recent emission test conducted for this emissions unit (currently 82% or 0.82)).

   f. The HAP content of each coating (in pounds per gallon, for each HAP), as applied.

   g. The total uncontrolled HAP emission rate from all coatings employed (i.e., the sum of C.1.f times C.1.c for each individual HAP and total HAPs for all of the coatings employed), in pounds or tons.

   h. The total controlled HAP emission rate from all coatings employed (i.e., the sum of C.1.f times C.1.c for each individual HAP and total HAPs for all of the coatings employed, in pounds or tons, multiplied by (1-X), where X is the control efficiency of the thermal incinerator (expressed as a decimal) based on the most recent emission test conducted for this emissions unit (currently 82% or 0.82)).

   i. The total controlled HAP emission rate from all coatings employed for the previous 12-month period (i.e., the sum of C.1.h. for each individual HAP and total HAPs for the previous 12 months).

   j. The total usage of coatings and inks in all flexographic, packaging rotogravure, and publication rotogravure printing lines at this facility, in tons.

2. 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.

3. 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 the value in Section B.1 above, 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing an exceedance of the 12-month individual or total HAP emission limit. 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.

2. The permittee shall also submit annual reports which summarize the monthly records specified in Section C for the previous calendar year. These reports shall be submitted by January 31 of each year for the previous calendar year.

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.

E. Testing Requirements

1. Compliance with the 11.2 pounds VOC per hour limit shall be based on a one-time calculation of maximum usage rate times maximum VOC content times minimum control efficiency:

   (9.18 gal/hr)(6.1 lbs VOC/gal)(1 - 0.80 control) = 11.2 lbs VOC/hr

2. Compliance with the 49.0 tons VOC per year limit shall be determined by summing the uncontrolled monthly VOC emission rate from all coatings employed, recorded per Section C.1.d for the calendar year, and multiplying this value by (1-X), where X is the control efficiency of the thermal incinerator (expressed as a decimal) based on the most recent emission test conducted for this emissions unit (currently 82% or 0.82).

3. Compliance with the individual and total HAP emissions limits shall be based upon the record keeping specified in Section C.1.i.

4. Compliance with the coating and inks usage limit in Section A.2.a shall be based upon the record keeping specified in Section C.1.j.

5. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC content of the coatings.

6. Compliance with the minimum operating temperature restriction for the thermal incinerator shall be determined based on the record keeping specified in Section C.3.

7. 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, with prior approval from the appropriate Ohio EPA District Office or local air agency.

F. Miscellaneous Requirements

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