

Facility ID: 1652050059 Issuance type: Title V Final Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 1652050059 Issuance type: Title V Final Permit

Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. Emissions units K001, K002, K003, K004 and K005 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 affected sources, as defined in 40 CFR 63.3310, pursuant to 40 CFR Part 63, Subpart JJJJ, which is included in the text of Attachment 1 hereto, and is hereby incorporated into this permit as if fully rewritten.
2. 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 section 63.3360 of 40 CFR Part 63, Subpart JJJJ within the time limits specified in section 63.7(a)(2) of 40 CFR Part 63, Subpart A.
3. Given the applicability of 40 CFR Part 63, Subpart JJJJ, the permittee must also comply with applicable provisions of 40 CFR Part 63, Subpart A as referenced in Table 2 of 40 CFR Part 63, Subpart JJJJ (see Attachment 1).
4. The following insignificant emissions units are located at this facility:

Z008 - Emergency Generator; and
Z009 - Boiler.

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, and as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally - approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

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Facility ID: 1652050059 Issuance type: Title V Final Permit

b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 - slitter #1 - slicing machine used to cut finished product;
Z002 - slitter #2 - slicing machine used to cut finished product;
Z003 - slitter #3 - slicing machine used to cut finished product;
Z004 - slitter #4 - slicing machine used to cut finished product;
Z005 - slitter #5 - slicing machine used to cut finished product;
Z006 - slitter #6 - slicing machine used to cut finished product;
Z007 - slitter #7 - slicing machine used to cut finished product;
Z010 - slitter #8 - slicing machine used to cut finished product;
Z011 - slitter #9 - slicing machine used to cut finished product; and
Z012 - unwind station #1.

- [Go to Part III for Emissions Unit K001](#)
- [Go to Part III for Emissions Unit K002](#)
- [Go to Part III for Emissions Unit K003](#)
- [Go to Part III for Emissions Unit K004](#)
- [Go to Part III for Emissions Unit K005](#)
- [Go to Part III for Emissions Unit L001](#)

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

Facility ID: 1652050059 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
vinyl coating line, including a drying oven, controlled by a thermal oxidizer or employ complying coatings	OAC rule 3745-21-09(H)(1)	See section A.I.2.a below.
	OAC rule 3745-21-09(H)(2) 40 CFR Part 63, Subpart JJJJ	See section A.I.2.b below. See Part II, sections A.1 through A.3 and Attachment 1.

2. Additional Terms and Conditions

- a. When venting the volatile organic compound emissions to the atmosphere, the volatile organic compound (VOC) content of the coatings employed in the vinyl coating line, as determined under paragraph (B) of rule 3745-21-10 of the Administrative Code, shall not exceed the following limitation:
 - (a)
 - i. 4.8 pounds of VOC per gallon of vinyl coating, excluding water and exempt solvents; or
 - ii. twenty-five per cent VOC by volume of the volatile matter of the vinyl coating.
 [Authority for term: OAC rule 3745-21-09(H)(1)]
 - b. When employing coatings that do not meet the requirements of section A.I.2.a above, the vinyl coating line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds, as determined under paragraph (C) of rule 3745-21-10 of the Administrative Code:
 - i. a capture efficiency which is at least 75%, by weight; and
 - ii. a control efficiency which is at least 90%, by weight.
 [Authority for term: OAC rule 3745-21-09(H)(2)]

- [Go to the top of this document](#)
- [Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation and employing coatings that do not meet the requirements of section A.I.2.a, 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- [Go to the top of this document](#)
- [Go to the top of Part III for this Emissions Unit](#)

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

III. **Monitoring and/or Record Keeping 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 and employing coatings that do not meet the requirements of section A.I.2.a. 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.

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
- b. 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.

[Authority for term: OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the MSDS sheets for each coating employed;
 - b. documentation as to whether or not each coating meets the requirements of section A.I.2.a; and
 - c. when a new coating is going to be employed in this emissions unit, the permittee shall determine and document, prior to employing the new coating, whether or not it meets the requirements of section A.I.2.a.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. If it is determined from the record keeping in section A.III.2 that a coating that meets the requirements of section A.I.2.a is going to be employed then for coatings that are vented to the atmosphere, the permittee shall collect and record the following information each month for the line:

- a. the name and identification number of each coating, as applied; and for each coating either
- b. the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied or
- c. the VOC content in percent VOC by volume of volatile matter.

[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]

4. If it is determined from the record keeping in section A.III.2 that a coating that meets the requirements of section A.I.2.a is going to be employed, the permittee shall collect and record the following information each day for the line:

- a. the identification of each coating employed;
- b. whether or not each coating employed meets the requirements of section A.I.2.a;
- c. if the coating does not meet the requirements of section A.I.2.a, confirmation that the VOC emissions from the noncomplying coatings were diverted to the control equipment; and
- d. the personnel initials.

[Authority for term: OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. **Reporting Requirements**

1. If it is determined from the record keeping in section A.III.2 that a coating that meets the requirements of section A.I.2.a is going to be employed, the permittee shall notify the Akron Regional Air Quality Management District in writing of any daily record showing the use of noncomplying coatings that were not vented to the thermal incinerator. The notification shall include a copy of such record and shall be sent to the Akron Regional Air Quality Management District within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation and employing coatings that do not meet the requirements of section A.I.2.a, 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.

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.

[Authority for term: OAC rule 3745-21-09(B)(3)(m) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

1. Compliance with the emission limitations in sections A.I.2.a and A.I.2.b of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

capture efficiency for VOC emissions which is at least 75%, by weight

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.2.

[Authority for term: OAC rule 3745-77-07(C)(1)]
 - b. Emission Limitation:

control efficiency for VOC emissions which is at least 90%, by weight

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.2.

[Authority for term: OAC rule 3745-77-07(C)(1)]
 - c. Emission Limitations:

4.8 pounds of VOC per gallon of vinyl coating, excluding water and exempt solvents or twenty-five per cent VOC by volume of the volatile matter of the vinyl coating

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 11.4 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.

[Authority for term: OAC rule 3745-21-10(B) and OAC rule 3745-77-07(C)(1)]
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 3 months after issuance of the permit and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.
 - 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 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 requirement.)
 - d. 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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.
 - e. The testing shall be conducted while the emissions unit is operating at or near maximum VOC loading conditions, unless otherwise specified or approved by the Akron Regional Air Quality Management District. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District's refusal to accept the results of the emission test(s).

Personnel from the Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.

[Authority for term: OAC rule 3745-21-10(C) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1652050059 Issuance type: Title V Final Permit

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K001 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
2. Additional Terms and Conditions		
1. None		

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. **Operational Restrictions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

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

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. **Reporting Requirements**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. **Testing Requirements**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1652050059 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K002 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
Emulsion Coater #1 - application of reverse roll coating with water-based pressure sensitive adhesive and laminate to various types of polycoated liners, polyesters, vinyls, polystyrenes, super calendared papers, papers and paper foils, dried with a natural gas-fired oven, air emissions of organic compounds (OCs) uncontrolled and vented to a roof stack	40 CFR Part 60, Subpart RR	On and after the date on which the performance test required by section 60.8 of 40 CFR Part 60, Subpart A has been completed, each owner or operator subject to 40 CFR Part 60, Subpart RR shall: cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied, as calculated on a weighted average basis for one calendar month.
	OAC rule 3745-21-09(F)	[Authority for term: section 60.442(a)(1) of 40 CFR Part 60, Subpart RR] 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents
	40 CFR Part 63, Subpart JJJJ	See Part II, sections A.1 through A.3 and Attachment 1.

2. **Additional Terms and Conditions**

- (a) None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. **Operational Restrictions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. **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, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]
2. To determine compliance with section 60.442(a)(1) of 40 CFR Part 60, Subpart RR, the owner or operator of the affected facility 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. Determine 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.

b. Compute the weighted average by the following equation:

$$G = \frac{\text{the summation } (W_{oi}) \times (M_{ci}) \text{ from } i=1 \text{ to } n}{\text{the summation of } (W_{si}) \times (M_{ci}) \text{ from } i = 1 \text{ to } n}$$

where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month;

M_{ci} = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records;

W_{oi} = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data; and

W_{si} = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with section 60.442(a)(1) of 40 CFR Part 60, Subpart RR.

[Authority for term: sections 60.441(b) and 60.443(a) of 40 CFR Part 60, Subpart RR]

3. After the initial performance test required for all affected facilities under section 60.8 of 40 CFR Part 60, Subpart A, compliance with the VOC emission limitation and percentage reduction requirements under section 60.442 of 40 CFR Part 60, Subpart RR 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.

[Authority for term: section 60.443(f) of 40 CFR Part 60, Subpart RR]

4. The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section A.V.1.b of these terms and conditions or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: section 60.445(a) of 40 CFR Part 60, Subpart RR]

5. Records of the measurements required in sections A.III.2 through A.III.4 of these terms and conditions must be retained for at least two years following the date of the measurements.

[Authority for term: section 60.445(h) of 40 CFR Part 60, Subpart RR]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Akron Regional Air Quality Management District within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g) and OAC rule 3745-77-07(C)(1)]

2. For all affected facilities subject to compliance with section 60.442(a)(1) of 40 CFR Part 60, Subpart RR, the performance test data and results from the performance test shall be submitted to the Administrator (the Akron Regional Air Quality Management District) as specified in section 60.8(a) of the General Provisions (40 CFR Part 60, Subpart A).

[Authority for term: section 60.447(a) of 40 CFR Part 60, Subpart RR]

3. Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Administrator (the Akron Regional Air Quality Management District) of exceedances of the VOC emission limits specified in section 60.442(a)(1) of 40 CFR Part 60, Subpart RR. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator (the Akron Regional Air Quality Management District) semiannually.

[Authority for term: section 60.447(b) of 40 CFR Part 60, Subpart RR]

4. The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

[Authority for term: section 60.447(d) of 40 CFR Part 60, Subpart RR]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. **Testing Requirements**

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

a. Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 11.4 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.

[Authority for term: OAC rule 3745-21-10(B) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

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

Applicable Compliance Method:

The performance test for affected facilities complying with section 60.442 of 40 CFR Part 60, Subpart RR without the use of add-on controls shall be identical to the procedures specified in section A.III.2 of these terms and conditions.

The VOC content per unit of coating solids applied and compliance with section 60.422(a)(1) of 40 CFR Part 60, Subpart RR shall be determined by either Method 24 and the equations specified in section A.III.2 of these terms and conditions or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Administrator may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

[Authority for term: sections 60.444(a) and 60.446(a) of 40 CFR Part 60, Subpart RR]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1652050059 Issuance type: Title V Final Permit

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K002 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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>
2. Additional Terms and Conditions		

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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III. Monitoring and/or Record Keeping Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050059 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K003 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
Coater with drying oven and laminating station - Emulsion Coater Number 2.	OAC rule 3745-31-05(A)(3) (PTI 16-02375)	65.0 pounds of organic compounds (OC) per hour for coatings
	OAC rule 3745-31-05(C) (to avoid being a major modification under the nonattainment provisions listed in Chapter 3745-31)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F), OAC rule 3745-31-05(C), 40 CFR Part 60, Subpart RR, and 40 CFR Part 63, Subpart JJJJ. Both the annual combined coating and cleanup material usage OC input rate* and the annual OC emissions shall not exceed 32.6 tons of OC per year as a rolling, 12-month summation (See A.I.2.b below.)

*Annual coating and cleanup material usage is based

upon a OC input rate that is equivalent to the annual OC emission rates and is based upon the following:
 OC input rate = (C) x (D) where C = the number of gallons of each coating and cleanup material employed and D = the OC content of each coating and clean up material employed in pounds of OC per gallon of coating and clean up material where 100% of the solvents in the coating and clean up materials employed is emitted.

OAC rule 3745-21-09(F) 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

40 CFR Part 60, Subpart RR On and after the date on which the performance test required by section 60.8 of 40 CFR Part 60, Subpart A has been completed each owner or operator subject to 40 CFR Part 60, Subpart RR shall:

Cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month.

[Authority for term: section 60.442(a)(1) of 40 CFR Part 60, Subpart RR]

40 CFR Part 63, Subpart JJJJ See Part II, sections A.1 through A.3 and Attachment 1.

2. Additional Terms and Conditions

- a. The hourly OC emission limitation regulated per OAC rule 3745-31-05(A)(3) is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.
- (a) However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).
 [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
- b. Both the annual combined coating and cleanup material usage OC input rate* and the annual emissions of OC from this emissions unit shall not exceed 32.6 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates and OC emissions, respectively. The permittee has existing coating and cleanup material usage OC input* records and therefore does not need to be limited to first year monthly coating and cleanup material usage OC input* amounts.
 [Authority for term: OAC rule 3745-31-05(C) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. Operational Restrictions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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III. 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, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied;
 - c. the OC content of each coating, in pounds per gallon, as applied;
 - d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the OC content of each cleanup material, in pounds per gallon;
 - g. the number of gallons of each cleanup material employed;
 - h. the total coating and clean up material usage OC input amounts* and the total OC emissions from all coatings and cleanup materials employed, in tons per month; and
 - i. the rolling, 12-month summation of the total coating and cleanup material usage OC input rate* and the total OC emissions from all coatings and cleanup materials employed, in tons per year.

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. To determine compliance with section 60.442(a)(1) of 40 CFR Part 60, Subpart RR, the owner or operator of the affected facility 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. Determine 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.

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

$$G = \frac{\text{[the summation (Woi) x (Mci) from } i=1 \text{ to } n\text{]}}{\text{[the summation of (Wsi) x (Mci) from } i = 1 \text{ to } n\text{]}}$$

where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month;

Mci = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records;

Woi = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data; and

Wsi = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with section 60.442(a)(1) of 40 CFR Part 60, Subpart RR.

[Authority for term: sections 60.441(b) and 60.443(a) of 40 CFR Part 60, Subpart RR]

3. After the initial performance test required for all affected facilities under section 60.8 of 40 CFR Part 60, Subpart A, compliance with the VOC emission limitation and percentage reduction requirements under section 60.442 of 40 CFR Part 60, Subpart RR 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.

[Authority for term: section 60.443(f) of 40 CFR Part 60, Subpart RR]

4. The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section A.V.1.d of these terms and conditions or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: section 60.445(a) of 40 CFR Part 60, Subpart RR]

5. Records of the measurements required in sections A.III.2 through A.III.4 of these terms and conditions must be retained for at least two years following the date of the measurements.

[Authority for term: section 60.445(h) of 40 CFR Part 60, Subpart RR]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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IV. Reporting Requirements

1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Akron Regional Air Quality Management District within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of either the rolling, 12-month emission limitation for OC and/or the coating and cleanup material usage OC input rate.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. For all affected facilities subject to compliance with section 60.442(a)(1) of 40 CFR Part 60, Subpart RR, the performance test data and results from the performance test shall be submitted to the Administrator (the Akron Regional Air Quality Management District) as specified in section 60.8(a) of the General Provisions (40 CFR Part 60, Subpart A).

[Authority for term: section 60.447(a) of 40 CFR Part 60, Subpart RR]

4. Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Administrator (the Akron Regional Air Quality Management District) of exceedances of the VOC emission limits specified in section 60.442(a)(1) of 40 CFR Part 60, Subpart RR. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator (the Akron Regional Air Quality Management District) semiannually.

[Authority for term: section 60.447(b) of 40 CFR Part 60, Subpart RR]

5. The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

[Authority for term: section 60.447(d) of 40 CFR Part 60, Subpart RR]

6. The 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.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

7. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

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

a. Emission Limitation:

65.0 pounds of OC per hour for coatings

Applicable Compliance Method:

Multiply the maximum pounds of coating applied per hour by the maximum OC weight fraction.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Both the annual combined coating and cleanup material usage OC input rate* and the annual OC emissions shall not exceed 32.6 tons of OC per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping as required in section A.III.1 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 11.4 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.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

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

Applicable Compliance Method:

The performance test for affected facilities complying with section 60.442 of 40 CFR Part 60, Subpart RR without the use of add-on controls shall be identical to the procedures specified in section A.III.2 of these terms and conditions.

The VOC content per unit of coating solids applied and compliance with section 60.422(a)(1) of 40 CFR Part 60, Subpart RR shall be determined by either Method 24 and the equation specified in section A.III.2 of these terms and conditions or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will

govern. The Administrator (the Akron Regional Air Quality Management District) may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

[Authority for term: sections 60.444(a) and 60.446(a) of 40 CFR Part 60, Subpart RR]

e. Emission Limitations:

You must limit organic HAP emissions to the level specified in paragraph i, ii, iii, or iv below:

- i. No more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or
- ii. No more than 4 percent of the mass of coating materials applied for each month at existing affected sources; or
- iii. No more than 20 percent of the mass of coating solids applied for each month at existing affected sources; or
- iv. If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Compliance with the emission limitations shall be demonstrated as described in section 63.3370 of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1652050059 Issuance type: Title V Final Permit

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K003 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
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2. **Additional Terms and Conditions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. **Operational Restrictions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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IV. **Reporting Requirements**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

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

Facility ID: 1652050059 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
Emulsion Coater #3 - application of reverse roll coating with water-based pressure sensitive adhesive and laminate to various types of polycoated liners, polyesters, vinyls, polystyrenes, super calendared papers, papers and paper foils, dried with a natural gas-fired oven, air emissions of organic compounds (OCs) uncontrolled and vented to a roof stack	OAC rule 3745-31-05(A)(3) (PTI 16-02229)	0.899 pound of organic compounds (OC) per gallon of coating, as applied after final formulation, excluding water and exempt solvents 35.9 tons per year of OC from coating
	40 CFR Part 60, Subpart RR	22.5 pounds per day & 4.11 tons per year of OC from cleanup See sections A.I.2, A.II.1 and A.II.2 for other requirements of this rule. On and after the date on which the performance test required by section 60.8 of 40 CFR Part 60, Subpart A has been completed each owner or operator subject to 40 CFR Part 60, Subpart RR shall: cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month.
	OAC rule 3745-21-09(F)	[Authority for term: section 60.442(a)(1) of 40 CFR Part 60, Subpart RR] The emission limitation required by this applicable

40 CFR Part 63, Subpart JJJJ

rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See Part II, sections A.1 through A.3 and Attachment 1.

2. Additional Terms and Conditions

- a. The OC emission limitations regulated per OAC rule 3745-31-05(A)(3) are based upon accepted USEPA potential to emit procedures for this emissions unit. Therefore, no emissions record keeping or reporting are required to demonstrate compliance with these emissions limits.

(a)

However, if any proposed change(s), such as with the type (chemical composition) and/or the volume of coatings and cleanup materials employed, or anything else that increase(s) the potential to emit any pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in the drying oven for this emissions unit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for the coating line:

- a. the name and identification of each coating employed; and
- b. the OC content of each coating employed, in pounds per gallon, as applied after final formulation, excluding water and exempt solvents.

[Note: For the purposes of this section, formulation data may be used to determine the OC content of each coating employed.]

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. To determine compliance with section 60.442(a)(1) of 40 CFR Part 60, Subpart RR, the owner or operator of the affected facility 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. Determine 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.

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

$$G = \frac{\text{the summation } (W_{oi}) \times (M_{ci}) \text{ from } i=1 \text{ to } n}{\text{the summation of } (W_{si}) \times (M_{ci}) \text{ from } i = 1 \text{ to } n}$$

where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month;

M_{ci} = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records;

W_{oi} = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data; and

W_{si} = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Method 24 or coating manufacturer's formulation data.

For each affected facility where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with section 60.442(a)(1) of 40 CFR Part 60, Subpart RR.

[Authority for term: sections 60.441(b) and 60.443(a) of 40 CFR Part 60, Subpart RR]

3. After the initial performance test required for all affected facilities under section 60.8 of 40 CFR Part 60, Subpart A, compliance with the VOC emission limitation and percentage reduction requirements under section 60.442 of 40 CFR Part 60, Subpart RR 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.

[Authority for term: section 60.443(f) of 40 CFR Part 60, Subpart RR]

4. The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section A.V.1.d of these terms and conditions or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: section 60.445(a) of 40 CFR Part 60, Subpart RR]

5. Records of the measurements required in sections A.III.2 through A.III.4 of these terms and conditions must be retained for at least two years following the date of the measurements.

[Authority for term: section 60.445(h) of 40 CFR Part 60, Subpart RR]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Akron Regional Air Quality Management District within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. For all affected facilities subject to compliance with section 60.442(a)(1) of 40 CFR Part 60, Subpart RR, the performance test data and results from the performance test shall be submitted to the Administrator (the Akron Regional Air Quality Management District) as specified in section 60.8(a) of the General Provisions (40 CFR Part 60, Subpart A).

[Authority for term: section 60.447(a) of 40 CFR Part 60, Subpart RR]

3. Following the initial performance test, the owner or operator of each affected facility shall submit quarterly reports to the Administrator (the Akron Regional Air Quality Management District) of exceedances of the VOC emission limits specified in section 60.442(a)(1) of 40 CFR Part 60, Subpart RR. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Administrator (the Akron Regional Air Quality Management District) semiannually.

[Authority for term: section 60.447(b) of 40 CFR Part 60, Subpart RR]

4. The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

[Authority for term: section 60.447(d) of 40 CFR Part 60, Subpart RR]

5. The 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.

6. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

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

- a. Emission Limitation:

0.899 pound of OC per gallon of coating, as applied after final formulation, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.1.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitations:

22.5 pounds per day & 4.11 tons per year of OC from cleanup

Applicable Compliance Method:

The above emission limitations are based on the potential to emit, as shown in the following equations, using company-specified data:

D = OU; and

$$Y = D(365 \text{ days/year})(1 \text{ ton}/2000 \text{ pounds})$$

where:

D = 22.5 pounds per day of OCs [daily potential to emit from cleanup];
 Y = 4.11 tons per year of OCs [yearly potential to emit from cleanup];
 O = 7.51 pounds of OCs/gallon of cleanup material [density of cleanup material]; and
 U = 3 gallons of cleanup material/day [potential daily usage].

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

35.9 tons per year of OC from coating

Applicable Compliance Method:

The above emission limitation is based on the potential to emit, as shown in the following equation, using company-specified data:

$$Y = OU(1 \text{ ton}/2000 \text{ pounds})$$

where:

Y = 35.9 tons per year of OCs [yearly potential to emit from coating];
 O = 0.899 pound of OCs/gallon of coating [maximum allowable OC content coating]; and
 U = 80,000 gallons of coating/year [potential annual usage].

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

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

Applicable Compliance Method:

The performance test for affected facilities complying with section 60.442 of 40 CFR Part 60, Subpart RR without the use of add-on controls shall be identical to the procedures specified in section A.III.2 of these terms and conditions.

The VOC content per unit of coating solids applied and compliance with section 60.422(a)(1) of 40 CFR Part 60, Subpart RR shall be determined by either Method 24 and the equations specified in section A.III.2 of these terms and conditions or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The Administrator (the Akron Regional Air Quality Management District) may require an owner or operator to perform Method 24 tests during such months as he deems appropriate. For Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.

[Authority for term: sections 60.444(a) and 60.446(a) of 40 CFR Part 60, Subpart RR]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

1. None

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

Facility ID: 1652050059 Issuance type: Title V Final Permit

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K004 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
Emulsion Coater #3 - application of reverse roll coating with water-based pressure sensitive adhesive and laminate to various types of polycoated liners, polyesters, vinyls, polystyrenes, super calendared papers, papers and paper foils, dried with a natural gas-fired oven, air emissions of organic compounds (OCs) uncontrolled and vented to a roof stack	none	See Part III, B.III.1 through 3 below.

2. **Additional Terms and Conditions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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II. **Operational Restrictions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

1. The permit to install for this emissions unit was evaluated based on the actual coatings and cleanup materials employed, and the design parameters of the 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit 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):

Pollutant: ethyl acetate (CAS 141-78-6)
 TLV (ug/m3): 1,440,000
 Maximum Hourly Emission Rate (lbs/hr): 22.5
 Predicted 1-Hour Maximum Ground-Level Concentration at 139 m (ug/m3): 2106
 MAGLC (ug/m3): 34,286

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

a. changes in the composition of the materials used (process materials and 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 the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxics 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 emissions unit, if changed as outlined above, will still satisfy the "Air Toxics Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics 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 Toxics Policy" for the change.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. **Reporting Requirements**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. **Testing Requirements**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. **Miscellaneous Requirements**

- 1. None

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

Facility ID: 1652050059 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K005 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
Solvent Coater - pressure sensitive tape & label adhesives applied to continuous web paper and film substrates, dried with rated 9.0 MM Btu/hr, natural gas-fired direct heat transfer oven, air emissions of volatile organic compounds (VOC) and organic hazardous air pollutants (HAPs) captured, vented to and destroyed by a natural gas-fired thermal oxidizer employing a 98% overall capture and control system (Modified).	OAC rule 3745-31-05(A)(3) (PTI 16-02263)	25.7 lbs/hr & 112.57 tons per year (tpy) of VOC emissions (thermal oxidizer stack emissions) 98% overall VOC emission reduction Note: All VOC emissions are considered to be organic HAP emissions. 5% opacity from any stack as a 6-minute average 0.1 lb/hr & 0.4 tpy of particulate emissions (PE) (thermal oxidizer stack emissions) 13.2 lbs/hr & 57.8 tpy of nitrogen oxides (NOx) emissions (thermal oxidizer stack emissions) 8.26 lbs/hr & 36.2 tpy of carbon monoxide (CO) emissions (thermal oxidizer stack emissions)
	40 CFR Part 63, Subpart JJJJ	The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart JJJJ. See Part II, sections A.1 through A.3 and Attachment 1.
	OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(F)	The emission limitations/reductions required by these applicable rules are less stringent than the emission limitations/reduction established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60 Subpart RR	The emission limitations/reductions required by this

applicable rule are less stringent than the emission limitations/reduction established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-07(A)

The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-17-11

The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. The hourly VOC, PE, NOx, and CO emission limitations regulated per OAC rule 3745-31-05(A)(3) are based upon accepted USEPA potential to emit procedures for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with these emissions limits.

(a)

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increase(s) the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

[Authority for term: OAC rule 3745-31-05(A)(3)]

- b. The permittee shall properly install, adjust, operate, and maintain, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), a thermal oxidizer and associated control equipment as necessary to adequately capture, contain, vent, and destroy air emissions of VOCs and HAPs from this emissions unit as required by this permit and to the extent possible with good engineering design and practice.

[Authority for term: OAC rule 3745-31-05(A)(3)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

1. The thermal oxidizer with all associated control equipment serving this emissions unit shall be in operation at all times when the emissions unit is in operation and coating raw materials. If the thermal oxidizer or any of its associated control equipment malfunctions or must be shut down for any reason, the emissions unit shall immediately cease coating until effective repairs are made. Once coating has ceased, the line may continue operating until the coated material is through the oven. Normal operation does not include oven startup before coating begins.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

2. The emissions unit, vented to the thermal oxidizer as required in normal operation, shall only vent directly to ambient air (e.g., through a bypass stack) during emergency conditions as detected by Lower Explosive Level (LEL) instrumentation and the direct venting to ambient air shall only occur until the emissions unit safely ceases coating raw material. The emissions unit shall remain shut down until the reason for the LEL emergency condition has been effectively identified and corrected and the emissions unit can resume normal operations, venting to the thermal oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

3. The average combustion temperature within the thermal oxidizer, 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.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

4. The permittee shall store all waste materials in closed containers with tightly fitted covers.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall document all times the thermal oxidizer and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records both the combustion temperatures within the thermal oxidizer and the exhaust gas temperature 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 monitors and recorders 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:

a. All 3-hour periods of time during which any average combustion temperature within the thermal oxidizer, 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/thermal oxidizers was in compliance.

b. A log or record of the downtime for the capture (collection) system(s), control devices, and monitoring equipment, when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-21-09(B)(3)(l), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information each month beginning on or before December 5, 2005:

a. The name and identification number of each coating, as applied.

b. The HAP content of each coating, as applied, in kilogram (kg) of HAP emitted/kg of coating applied.

c. The pounds of HAP per gallon of coating solids, as applied, and the volume solids content, as applied.

d. The number of gallons of each coating employed.

e. The total volume of solids from all coatings, in gallons.

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

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

h. The HAP content of each cleanup material, as applied, in kilogram (kg) of HAP emitted/kg of coating applied.

i. The pounds of HAP per gallon of cleanup material solids, as applied, and the volume solids content, as applied.

j. The calculated, controlled HAP emission rate for all coatings and cleanup materials, in pounds or tons. The controlled HAP 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.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The name and identification number of each coating, as applied.

b. The VOC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

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

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

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

h. 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.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. Beginning on or before December 5, 2005, the permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing that the HAP content of any coating and/or clean up material exceeded the applicable limitation of (1) 95% overall control efficiency; or (2) 0.04 kg emitted per kg of coating; or 0.20 kg emitted per kg of coating solids as applied.

The notification shall include a copy of such record and shall be sent to the Akron Regional Air Quality Management District within 45 days after the exceedance(s) occurred.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports which identify:

a. all 3-hour periods of time during which the average combustion temperature within the thermal oxidizer

did not comply with the temperature limitation specified above; and

b. all periods when the stack that bypasses the thermal oxidizer is used while employing solvent-based coatings in the emissions unit.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in General Term and Condition A.1.c of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

1. The permittee shall determine the organic HAP and VOC contents for all coatings and cleanup materials using one of the three methods specified in 40 CFR 63.3360(c) and (d). These methods include determination of the HAP and VOC mass fraction using USEPA Method 311, Method 24 or formulation data provided by the manufacturer. In the event of inconsistency between any of the referenced Methods and formulation data, the results of Method 311 will govern for HAP content and the results of Method 24 will govern for total VOC content.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

5% opacity from any stack, as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

0.1 lb/hr & 0.4 tpy of PM (thermal oxidizer stack emissions)

Applicable Compliance Method:

The above emission limitations are based upon the potential to emit as determined from vendor emissions data. If necessary, stack testing may be required to demonstrate compliance with the hourly emission limitation using US EPA Test Methods 1 through 5 or other US EPA-approved test methods.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

25.7 lbs/hr & 112.57 tpy of VOC emissions (thermal oxidizer stack emissions)

Applicable Compliance Method:

The hourly emission limit is based upon the controlled potential to emit as determined from company emissions data. Compliance with the annual emissions limit shall be based upon the use of Method 24 and formulation data, or any alternative compliance test method approved by the US EPA, for determining the VOC content of each coating, and the record keeping requirements of section A.III.4 above.

[Note: Compliance with the hourly allowable VOC emission rate (i.e., 26.7 lbs/hr) can be verified during the "98% overall VOC emission reduction" performance testing.]

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

98% overall VOC emission reduction

Applicable Compliance Method:

Performance testing shall be conducted within 60 days after achieving maximum production at which the

emissions unit will be operated, but not later than 180 days after initial start-up of the emissions unit and at such other times as may be required by the Administrator (the Akron Regional Air Quality Management District) under section 114 of the Clean Air Act. See section A.V.3.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

13.2 lbs/hr & 57.8 tpy of NO_x emissions (thermal oxidizer stack emissions)

Applicable Compliance Method:

The above emission limitations are based upon the potential to emit as determined from vendor emissions data. If necessary, stack testing may be required demonstrate compliance with the hourly emission limitation using US EPA Test Methods 1 through 4 and Method 7 or other US EPA-approved test methods.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitations:

8.26 lbs/hr & 36.2 tpy of CO emissions (thermal oxidizer stack emissions)

Applicable Compliance Method:

The above emission limitations are based upon the potential to emit as determined from vendor emissions data. If necessary, stack testing may be required to demonstrate compliance with the hourly emission limitation using US EPA Test Methods 1 through 4 and Method 10 or other US EPA-approved test methods.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g. Emission Limitation:

95% overall HAP emission reduction as calculated over a calendar month

Applicable Compliance Method:

Performance testing shall be conducted within 60 days after achieving maximum production at which the emissions unit will be operated, but not later than 180 days after initial start-up of the emissions unit and at such other times as may be required by the Administrator (the Akron Regional Air Quality Management District) under section 114 of the Clean Air Act. See section A.V.3.

[Note: Compliance with the 95% overall HAP emission reduction requirement is assumed if the permittee demonstrates compliance with the 98% overall VOC emission reduction requirement.]

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

h. Emission Limitations:

0.04 kg of HAPs emitted/kg of coating applied each calendar month and 0.20 kg of HAPs emitted/kg of coating solids applied each calendar month

Applicable Compliance Method:

Compliance shall be based upon one of the three methods specified in 40 CFR 63.3360 (c) and (d). These methods include determination of the HAP and VOC mass fraction using USEPA Method 311, Method 24 or formulation data provided by the manufacturer. In the event of inconsistency between any of the referenced Methods and formulation data, the results of Method 311 will govern for HAP content and the results of Method 24 will govern for total VOC content, and on the record keeping requirements of section A.III.3 above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. 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 60 days after achieving maximum production at which the emissions unit will be operated, but not later than 180 days after initial start-up of the emissions unit and at such other times as may be required by the Administrator (the Akron Regional Air Quality Management District) under section 114 of the Clean Air Act.

b. The emission testing shall be conducted to demonstrate compliance with the 98% overall VOC emission reduction requirement.

[Note: Compliance with the 95% overall HAP emission reduction requirement is assumed if the permittee demonstrates compliance with the 98% overall VOC emission reduction requirement.]

c. The test method(s) which must be employed to demonstrate compliance with the 98% overall VOC emission reduction requirement are specified below.

- d. The capture efficiency shall be determined using Methods 204 through Method 204F, as specified 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 "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request for the use of an alternative method, including an evaluation of the applicability, necessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)
- e. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10(C). 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 Administrator.

- f. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron Regional Air Quality Management District. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District's refusal to accept the results of the emission test(s).

Personnel from the Akron Regional Air Quality Management District 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

- 1. None

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

Facility ID: 1652050059 Issuance type: Title V Final Permit

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K005 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **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>
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2. **Additional Terms and Conditions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. **Operational Restrictions**

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050059 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: L001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. 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>
Die Cleaning Station - cold solvent cleaning of metal coating die, air emissions of volatile organic compounds (VOC) and organic hazardous air pollutants (HAPs) captured and vented to a roof stack.	OAC rule 3745-31-05(A)(3) of metal coating die, air emissions of volatile organic compounds (VOC) and organic hazardous air pollutants (HAPs) captured and vented to a roof stack. OAC rule 3745-21-09(O)	0.9 lb/hr and 4 tpy of VOC emissions The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O). See sections A.I.2.b through A.I.2.e below.

2. Additional Terms and Conditions

- a. The hourly VOC emission limitation regulated per OAC rule 3745-31-05(A)(3) is based upon accepted USEPA potential to emit procedures for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with this emission limitation.

(a)

However, if any proposed change(s), such as with production capacity, the types and/or quantities of solvent and/or materials used or processed, or anything else that increase(s) the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

- b. The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3

pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

- c. The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

- d. A freeboard ratio of greater than or equal to 0.7 shall be maintained.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

- e. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

i. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.

ii. Store waste solvent in covered containers.

iii. Close the cover whenever parts are not being handled in the cleaner.

iv. Drain the cleaned parts until dripping ceases.

v. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.

vi. Clean only materials that are neither porous nor absorbent.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. Operational Restrictions

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records for at least five years of the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit, and make these records available to the Akron Regional Air Quality Management District upon verbal or written request.

[Authority for term: OAC rule 3745-21-09(O)(5), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

- a. the name and identification number of each solvent employed;
- b. the VOC content of each solvent employed, in pounds per gallon;
- c. the number of gallons of each solvent employed; and
- d. the VOC emissions from all solvents employed.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

V. **Testing Requirements**

1. The permittee shall determine the VOC contents for all coatings and cleanup materials using one of two methods specified in 40 CFR 63.3360 (d). These methods include determination of the VOC mass fraction using USEPA Method 24 or formulation data provided by the manufacturer. In the event of inconsistency between Method 24 and formulation data, the results of Method 24 will govern.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

a. Emission Limitation:

0.9 lb/hr of VOC emissions

Applicable Compliance Method:

The above emission limitation was established as follows:

H = DVT

where:

H = 0.9 pound/hour VOCs [potential hourly VOC emissions];

D = 6.71 pounds VOCs/gallon solvent [solvent VOC content];

V = 1210 gallons solvent/year [estimated potential usage serving as cleanup for K005 at maximum capacity]; and

T = 1 year/8760 hours [time conversion].

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

4 tpy of VOC emissions

Applicable Compliance Method:

Compliance with the above emission limitation shall be based on the record keeping requirements specified in section A.III.2 above.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050059 Issuance type: Title V Final Permit

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: L001 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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>
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2. **Additional Terms and Conditions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

II. **Operational Restrictions**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

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

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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

IV. **Reporting Requirements**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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V. **Testing Requirements**

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

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VI. **Miscellaneous Requirements**

1. None