

Facility ID: 1667040151 Issuance type: Final State Permit To Operate

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

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

Facility ID: 1667040151 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

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

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - 80 inch reverse roll coating head and two zone oven - 80 inch coating line.	OAC rule 3745-31-05(A)(3) (PTI 16-02434)	5.0 pounds of volatile organic compounds (VOC) per hour for coatings
	OAC rule 3745-21-09(F)	22.7 tons of VOC per year for coatings and cleanup materials
	40 CFR Part 60, subpart RR	2.9 pounds VOC per gallon of coating, excluding water and exempt solvents Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a) of 40 CFR Part 60, subpart RR, however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to section 60.442(a) and all other sections of 40 CFR Part 60, subpart RR.

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon or weight fraction;
 - c. the number of gallons or pounds of each coating and cleanup material employed;
 - d. the total VOC emission rate for all coatings, in pounds per month (i.e., the sum of (b) times (c) for each coating);
 - e. the total VOC emission rate for all cleanup materials, in pounds per month (i.e., the sum of (b) times (c) for

each cleanup material);

- f. the total VOC emission rate for all coatings and cleanup materials, in tons per month (i.e., [(d) plus (e)] divided by 2000)
 - g. the total number of hours the emissions unit was in operation; and
 - h. the average hourly VOC emission rate for all coatings, in pounds per hour (average) (i.e., (d)/(g)).
3. 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 40.446(a) of 40 CFR Part 60, subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.
 4. The owner or operator of an affected facility operating at the conditions specified in section 60.440(b) of 40 CFR Part 60, subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.
 5. Records of the measurements required in sections A.III.3 through A.III.4 of these terms and conditions must be retained for at least two years following the date of the measurements.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports which includes an identification of each month during which the average hourly VOC emissions from the coatings exceeded 5.0 pounds per hour, and the actual average hourly VOC emissions for each such month.
3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

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

Applicable Compliance Method:

Compliance with the emission limitation shall be based upon the record keeping requirements specified in section C.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 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Emission Limitation:

5.0 pounds of VOC per hour for coatings

22.7 tons of VOC per year for coatings and cleanup materials

Applicable Compliance Method:

Compliance with the emission limitations shall be determined through record keeping of the coating and the cleanup material usage, VOC content of each coating and cleanup material, and operating hours per month as required in section C.2 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the cleanup materials.

Emission Limitation:

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a) of 40 CFR Part 60, subpart RR, however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to section 60.442(a) and all other sections of 40 CFR Part 60, subpart RR.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping as required in sections A.III.2 and A.III.3 of these terms and conditions.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances

and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.