

Facility ID: 1677150028 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: 1677150028 Emissions Unit ID: K009 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
BGM Laminator	OAC rule 3745-31-05(A)(3)	0.37 lb/hr of volatile organic compounds (VOC) for coatings
	OAC rule 3745-31-05(D)	Combined annual emissions from all facility emissions units shall not exceed the following as rolling, 12-month summations: 95.0 tons of VOC and OC; 24.0 tons of all hazardous air pollutants (HAPs); and 9.0 tons of any individual HAP. See A.2.a below. See A.2.b below.
	OAC rule 3745-21-09(F)	

2. **Additional Terms and Conditions**
 - (a) The emissions of volatile organic compounds (VOC) and organic compounds (OC), individual Hazardous Air Pollutant (HAP), and combined HAPs from this facility which consists of emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and P001 shall not exceed 95.0, 9.0, and 24.0 tons per year, respectively, based upon a rolling, 12-month summation of the monthly emissions. The cumulative emissions table is not necessary because the permittee has sufficient records to demonstrate compliance with the rolling 12-month emissions limitation for the past 12 months. The permittee shall not employ any adhesive with a VOC content in excess of 2.9 pounds of VOC per gallon of adhesive, excluding water and exempt solvents.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the facility-wide emission limitations, the permittee shall maintain monthly records which contain the following information:
 - a. the name and company identification of each ink, coating, and cleanup material, as applied;
 - b. Material Safety Data Sheets from the supplier that list the VOC content of each ink, coating, and cleanup material, as applied, in pounds per gallon;
 - c. the number of gallons of each ink, coating, and cleanup material, as applied;
 - d. Material Safety Data Sheets from the supplier that list the percent, by weight, of each HAP for each ink, coating, and cleanup material; and,
 - e. the VOC content in pounds of VOC per gallon of adhesive, excluding water and exempt solvents.

2. The permittee shall, on a monthly basis, calculate and record for the entire facility which consists of emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, and P001 the individual HAP, combined HAP, and VOC and OC emission rates, in tons per month, and in tons per rolling, 12-month period.

These mass emissions shall be calculated in accordance with the following methodology:

Facility individual HAP

summation of the pounds of each ink, coating, and cleanup material multiplied by the individual HAP content, in weight percent, for each individual HAP

Facility combined HAP

summation of all individual HAPs from the facility calculation

Facility VOC and OC emissions

summation of the gallons of each ink, coating, and cleanup material multiplied by the VOC content, in pounds/gallon

3. The permittee shall collect and record the following information each month for this emissions unit:

- a. the number of hours the emissions unit was in operation;
- b. the production of the emissions unit in thousand square feet (msf) or tons; and
- c. the calculated hourly VOC emission rate, in pounds per hour (average).

The VOC emission rate shall be calculated in accordance with the following methodology:

Divide the production for the line by the total production for the entire facility for the month to obtain a production ratio for the line. Multiply the production ratio for the line by the total VOC emissions for the month to obtain the pounds of VOC per month per line. Divide the result by the hours of operation for the month for the line to obtain the average hourly VOC emission rate for the line.

4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
- a. the background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility emission limitations for VOC and OC, individual HAP, and combined HAP.
2. The permittee shall submit deviation (excursion) reports which include any record showing an exceedance of the hourly allowable mass emission rate for VOC.
3. The permittee shall submit deviation (excursion) reports which identify any monthly record showing the use of noncomplying coatings or inks unless the daily record shows that the daily volume-weighted average VOC content of all coatings and inks employed on that day does not exceed the applicable emission limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Regional Air Quality Management) within 45 days after the exceedance occurs.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3 of this permit.

E. Testing Requirements

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

Emission Limitation:

0.37 lb/hr of VOC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.3 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for adhesives, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular adhesive, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that adhesive to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:

95.0 TPY VOC and OC, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1 and C.2 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings, flexographic and rotogravure printing inks, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

Emission Limitation:

24.0 TPY all HAPs, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1 and C.2 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

9.0 TPY any individual HAP, facility-wide

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1 and C.2 of these terms and conditions.

Formulation data shall be used to determine the HAP content for coatings, flexographic and rotogravure printing inks, cleanup materials, and related coatings, respectively.

Emission Limitation:

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.1 of these terms and conditions.

USEPA Methods 24 and 24A shall be used to determine the VOC content for adhesives, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular adhesive, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that adhesive to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. The emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: vinyl acetate

TLV (mg/m3): 35.0

Maximum Hourly Emission Rate (lbs/hr): 0.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 39.0

MAGLC (ug/m3): 833.3

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

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

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

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

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

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

- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.
- For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.
- 2. In accordance with OAC rule 3745-31-05(D), sections A, C1, C2, C3, D, and E of these terms and conditions constitute the federally enforceable portions of this permit to install.