State of Ohio Environmental Protection Agency

STREET ADDRESS:
Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

11/17/2008

Certified Mail
Facility ID: 0855140350
Permit Number: P0092379
County: Miami

Ronald Dye
Spinnaker Coating
130 Marybill Drive
Troy, OH 45373

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Regional Air Pollution Control Agency. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Regional Air Pollution Control Agency

**State of Ohio Environmental Protection Agency**
**Division of Air Pollution Control**

# FINAL

# Title V Permit to Control Air Pollution
# OAC Chapter 3745-77

## Spinnaker Coating

Facility ID: 0855140350
Permit Number: P0092379
Permit Type: Initial
Issued: 11/17/2008
Effective: 12/8/2008
Expiration: 12/8/2013

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

**Title V Permit to Control Air Pollution**
**OAC Chapter 3745-77**
Spinnaker Coating

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# Authorization

Facility ID: 0855140350
Facility Description: Paper coated and laminated packaging
Application Number(s): A0023809, A0023810
Permit Number: P0092379
Permit Description: Paper coated and laminated packaging
Permit Type: Initial
Issue Date: 11/17/2008
Effective Date: 12/8/2008
Expiration Date: 12/8/2013
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Spinnaker Coating
130 Marybill Drive
Troy, OH 45373

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Regional Air Pollution Control Agency. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
*(Authority for term: ORC 3704.036(A))*

## 2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Regional Air Pollution Control Agency.
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. General Requirements**

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee

shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the

Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as

soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
*(Authority for term: OAC rule 3745-77-07(I))*

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention Requirements Under State Law Only**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports

pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

# B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to MACT Subpart JJJJ (Paper and Other Web Coatings): K001, K002, K003 and K004. The complete MACT requirements, including the MACT General provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Regional Air Pollution Control Agency (RAPCA).

   Affected sources must choose to comply with one of four emissions limits that are included in 40 CFR 63.3320(b). The permittee has chosen to comply with 40 CFR 63.3320(b)(2), which states that organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month. In addition, permittee must choose a compliance method from 40 CFR 63.3370(a); they have chosen to use "as purchased" compliant coating materials and will comply with the limits using the procedure set out in 40 CFR 63.3370(b).

   [Authority for term: 40 CFR Part 63, Subpart JJJJ and PTI 08-04800]

3. The following insignificant emissions units are located at this facility:

   K003 - Hot Melt Extrusion Paper Coating Line; Coater No. 17 [PTI 08-04800 and 40 CFR Part 63, Subpart JJJJ]

   P001 - Roll Cleaning Tank [PTI 08-1499]

   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, 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)]

# C. Emissions Unit Terms and Conditions

**1. K001, Coater #18**

**Operations, Property and/or Equipment Description:**

Water-Based Adhesive Paper Coating (Roll Coating Operation) Line with Natural Gas Fired Drying Oven

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(D)<br>(Synthetic minor to avoid being classified as a major stationary source per OAC rule 3745-31-01(KKK))<br>PTI 08-04800 | Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 21.0 tons per rolling 12-month period. |
| b. | OAC rule 3745-31-05(A)(3)<br>PTI 08-04800 | The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(F), 3745-21-09(H) and 3745-31-05(D). |
| c. | OAC rule 3745-21-09(F) | When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| d. | OAC rule 3745-21-09(H) | When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| e. | 40 CFR 60.440(b)<br>(40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations) | See b)(2)a. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | |
| f. | 40 CFR 63.3320(b)(2)<br>(40 CFR Part 63, Subpart JJJJ - National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating) | Organic Hazardous Air Pollutant (HAP) emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.<br><br>See b)(2)b. |
| g. | 40 CFR 63.1 through 15<br>(40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions) | Table 2 to Subpart JJJJ of 40 CFR Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General provisions in 40 CFR 63.1 through 15 apply. |

(2) Additional Terms and Conditions

a. Any affected facility (i.e., coating line) 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 40 CFR 60.442(a), 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 40 CFR 60.442(a) and all other sections of 40 CFR Part 60 Subpart RR. VOC emissions are limited to 21.0 tons per rolling 12-month period per OAC rule 3745-31-05(C), therefore, this emissions unit is not subject to the emissions limits of 40 CFR 60.442(a).

b. Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased in accordance with 40 CFR 63.3370(a)(1)(i).

c) Operational Restrictions

(1) The annual VOC input for this emissions unit shall not exceed 21.0 tons per year, based upon a rolling, 12-month summation of the VOC input.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 08-04800].

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name, identification number, and substrate (paper or vinyl) of each coating, as applied;

b. the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating employed;

d. the name and identification of each preparation and cleanup material employed;

e. the VOC content of each preparation and cleanup material, in pounds per gallon;

f. the number of gallons of each preparation and cleanup material employed;

g. the total VOC emissions from all coatings, preparation and cleanup materials employed, in tons;

h. the rolling, 12-month summation of VOC emissions, in tons; and,

i. the rolling, 12-month summation of the VOC input rates.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3360(c)(1), (2) or (3) - performance test for organic HAP content

63.3370(a)(1) and (b) - demonstrating compliance using "as-purchased" compliant coating materials

63.3410(a)(1)(iii) and (vi) - records of organic HAP content data

[Authority for term: 40 CFR Part 63 Subpart JJJJ and PTI 08-04800]

e) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC input limitation; and

b. the rolling, 12-month summation of VOC emissions.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart JJJJ, per the following section:

63.3400(c) - semiannual compliance report

[Authority for term: 40 CFR Part 63 Subpart JJJJ and PTI 08-04800]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

VOC emissions from this emissions unit shall not exceed 21.0 tons per rolling 12-month period.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

b. Emissions Limitation

When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

c. Emissions Limitation

When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

d. Emissions Limitations

Organic HAP emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.

Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased.

Applicable Compliance Method

Compliance with the emissions limitations shall be based upon the record keeping specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

g) Miscellaneous Requirements

(1) None.

**2. K002, Coater #19**

**Operations, Property and/or Equipment Description:**

Magna-Graphics Slot Die Paper Coating Line with Natural Gas Fired Drying Oven

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(D)<br>(Synthetic minor to avoid 40 CFR 60.442(a) and being classified as a major stationary source per OAC rule 3745-31-01(KKK))<br>PTI 08-04800 | Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 49.0 tons per rolling 12-month period. |
| b. | OAC rule 3745-31-05(A)(3)<br>PTI 08-04800 | The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-21-09(F), 3745-21-09(H) and 3745-31-05(D). |
| c. | OAC rule 3745-21-09(F) | When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| d. | OAC rule 3745-21-09(H) | When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| e. | 40 CFR 60.440(b)<br>(40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations) | See b)(2)a. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | |
| f. | 40 CFR 63.3320(b)(2)<br>(40 CFR Part 63, Subpart JJJJ - National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating) | Organic Hazardous Air Pollutant (HAP) emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.<br><br>See b)(2)b. |
| g. | 40 CFR 63.1 through 15<br>(40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions) | Table 2 to Subpart JJJJ of 40 CFR Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General provisions in 40 CFR 63.1 through 15 apply. |
| h. | OAC rule 3745-21-08(B) | Carbon monoxide (CO) emissions from this emissions unit shall not exceed 1.3 lbs/hr.<br><br>See b)(2)c. |
| i. | OAC rule 3745-31-05(A)(3)(b) | See b)(2)d. |

(2) Additional Terms and Conditions

a. Any affected facility (i.e., coating line) 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 40 CFR 60.442(a), 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 40 CFR 60.442(a) and all other sections of 40 CFR Part 60 Subpart RR. VOC emissions are limited to 49.0 tons per rolling 12-month period per OAC rule 3745-31-05(C), therefore, this emissions unit is not subject to the emissions limits of 40 CFR 60.442(a).

b. Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased in accordance with 40 CFR 63.3370(a)(1)(i).

c. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in PTI 08-04800.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However,

that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

d. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled $NO_X$ and CO emissions from this air contaminant source since the potential to emit for $NO_X$ and CO is less than ten tons per year.

c) Operational Restrictions

(1) The annual VOC input for this emissions unit shall not exceed 49.0 tons per year, based upon a rolling, 12-month summation of the VOC input.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 08-04800]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name, identification number, and substrate (paper or vinyl) of each coating, as applied;

b. the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating employed;

d. the name and identification of each preparation and cleanup material employed;

e. the VOC content of each preparation and cleanup material, in pounds per gallon;

f. the number of gallons of each preparation and cleanup material employed;

g. the total VOC emissions from all coatings, preparation and cleanup materials employed, in tons;

h. the rolling, 12-month summation of VOC emissions, in tons; and,

i. the rolling, 12-month summation of the VOC input rates.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3360(c)(1), (2) or (3) - performance test for organic HAP content

63.3370(a)(1) and (b) - demonstrating compliance using "as-purchased" compliant coating materials

63.3410(a)(1)(iii) and (vi) - records of organic HAP content data

[Authority for term: 40 CFR Part 63 Subpart JJJJ and PTI 08-04800]

e) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC input limitation; and

b. the rolling, 12-month summation of VOC emissions.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart JJJJ, per the following section:

63.3400(c) - semiannual compliance report

[Authority for term: 40 CFR Part 63 Subpart JJJJ and PTI 08-04800]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

VOC emissions from this emissions unit shall not exceed 49.0 tons per rolling 12-month period.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

b. Emissions Limitation

When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

c. Emissions Limitation

When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

d. Emissions Limitation

Organic HAP emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.

Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased.

Applicable Compliance Method

Compliance with the emissions limitations shall be based upon the record keeping specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

e. Emissions Limitation

CO emissions from this emissions unit shall not exceed 1.3 lbs/hr.

Applicable Compliance Method

Compliance shall be determined using AP-42 Table 1.4-1 (July 1998) and inputs representing the potential to emit, as follows:

Emissions = (maximum heat input rating) * (emission factor) * (fuel heat content)

Emissions = (3 * 5 mmBtu/hr) * (84 lb/mmcf) * (1,000 mmBtu/mmcf) = 1.26 lbs/hr

If required, compliance shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

g) Miscellaneous Requirements

(1) None.

**3. K004, Coater #20**

**Operations, Property and/or Equipment Description:**

Silicone Paper Coating (Roll Coating Operation) Line with Natural Gas Fired Drying Oven

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(D)<br>(Synthetic minor to avoid being classified as a major stationary source per OAC rule 3745-31-01(KKK))<br>PTI 08-04800 | Volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 16.8 tons per rolling 12-month period. |
| b. | OAC rule 3745-31-05(A)(3)<br>PTI 08-04800 | The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08(B), 3745-21-09(F), 3745-21-09(H) and 3745-31-05(D). |
| c. | OAC rule 3745-21-09(F) | When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| d. | OAC rule 3745-21-09(H) | When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents. |
| e. | 40 CFR 60.440(b)<br>(40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations) | See b)(2)a. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | |
| f. | 40 CFR 63.3320(b)(2)<br>(40 CFR Part 63, Subpart JJJJ - National Emissions Standards for Hazardous Air Pollutants: Paper and Other Web Coating) | Organic Hazardous Air Pollutant (HAP) emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.<br><br>See b)(2)b. |
| g. | 40 CFR 63.1 through 15<br>(40 CFR Part 63, Subpart A - National Emissions Standards for Hazardous Air Pollutants: General Provisions) | Table 2 to Subpart JJJJ of 40 CFR Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General provisions in 40 CFR 63.1 through 15 apply. |
| h. | OAC rule 3745-21-08(B) | Carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.9 lb/hr.<br><br>See b)(2)c. |
| i. | OAC rule 3745-31-05(A)(3)(b) | See b)(2)d. |

(2) Additional Terms and Conditions

a. Any affected facility (i.e., coating line) 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 40 CFR 60.442(a), 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 40 CFR 60.442(a) and all other sections of 40 CFR Part 60 Subpart RR. VOC emissions are limited to 16.8 tons per rolling 12-month period per OAC rule 3745-31-05(C), therefore, this emissions unit is not subject to the emissions limits of 40 CFR 60.442(a).

b. Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased in accordance with 40 CFR 63.3370(a)(1)(i).

c. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in PTI 08-04800.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However,

that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

d. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled $NO_X$ and CO emissions from this air contaminant source since the potential to emit for $NO_X$ and CO is less than ten tons per year.

c) Operational Restrictions

(1) The annual VOC input for this emissions unit shall not exceed 16.8 tons per year, based upon a rolling, 12-month summation of the VOC input.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 08-04800]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name, identification number, and substrate (paper or vinyl) of each coating, as applied;

b. the VOC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;

c. the number of gallons (excluding water and exempt solvents) of each coating employed;

d. the name and identification of each preparation and cleanup material employed;

e. the VOC content of each preparation and cleanup material, in pounds per gallon;

f. the number of gallons of each preparation and cleanup material employed;

g. the total VOC emissions from all coatings, preparation and cleanup materials employed, in tons;

h. the rolling, 12-month summation of VOC emissions, in tons; and,

i. the rolling, 12-month summation of the VOC input rates.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3360(c)(1), (2) or (3) - performance test for organic HAP content

63.3370(a)(1) and (b) - demonstrating compliance using "as-purchased" compliant coating materials

63.3410(a)(1)(iii) and (vi) - records of organic HAP content data

[Authority for term: 40 CFR Part 63 Subpart JJJJ and PTI 08-04800]

e) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month VOC input limitation; and

b. the rolling, 12-month summation of VOC emissions.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report in accordance with OAC rule 3745-78-02(A).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

(4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart JJJJ, per the following section:

63.3400(c) - semiannual compliance report

[Authority for term: 40 CFR Part 63 Subpart JJJJ and PTI 08-04800]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation

VOC emissions from this emissions unit shall not exceed 16.8 tons per rolling 12-month period.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

b. Emissions Limitation

When coating paper, the VOC content of the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

c. Emissions Limitation

When coating vinyl, the VOC content of the coatings employed in this emissions unit shall not exceed 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method

Compliance with the emissions limitation shall be based upon the record keeping specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

d. Emissions Limitations

Organic HAP emissions from emissions units K001, K002, K003 and K004 shall not exceed 4 percent of the mass of coating materials applied for each month.

Each coating material used at emissions units K001, K002, K003 and K004 shall not exceed 0.04 kg organic HAP per kg coating material as-purchased.

Applicable Compliance Method

Compliance with the emissions limitations shall be based upon the record keeping specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

e. Emissions Limitation

CO emissions from this emissions unit shall not exceed 0.9 lb/hr.

Applicable Compliance Method

Compliance shall be determined using AP-42 Table 1.4-1 (July 1998) and inputs representing the potential to emit, as follows:

Emissions = (maximum heat input rating) * (emission factor) * (fuel heat content)

Emissions = (3 * 3.5 mmBtu/hr) * (84 lb/mmcf) * (1,000 mmBtu/mmcf) = 0.9 lb/hr

If required, compliance shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 08-04800]

g) Miscellaneous Requirements

(1) None.