



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

7/27/2009

Certified Mail

Okamoto Sandusky Manufacturing LLC
3130 West Monroe Street
Sandusky, OH 44870

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0322020019
Permit Number: P0105208
Permit Type: Administrative Modification
County: Erie

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI 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 Ohio EPA DAPC, Northwest District Office. 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



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

FINAL

**Air Pollution Permit-to-Install
for
Okamoto Sandusky Manufacturing LLC**

Facility ID: 0322020019
Permit Number: P0105208
Permit Type: Administrative Modification
Issued: 7/27/2009
Effective: 7/27/2009



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install
 for
 Okamoto Sandusky Manufacturing LLC

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105208
Facility ID: 0322020019
Effective Date: 7/27/2009

Authorization

Facility ID: 0322020019
Facility Description: The company produces vinyl products for the automotive industry.
Application Number(s): M0000518
Permit Number: P0105208
Permit Description: Administrative modification of PTI #P0103967, to add an opacity limit.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 7/27/2009
Effective Date: 7/27/2009

This document constitutes issuance to:

Okamoto Sandusky Manufacturing LLC
3130 West Monroe Street
Sandusky, OH 44870

Of a Permit-to-Install for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105208
Facility ID: 0322020019
Effective Date: 7/27/2009

Authorization (continued)

Permit Number: P0105208
 Permit Description: Administrative modification of PTI #P0103967, to add an opacity limit.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P031
Company Equipment ID:	Embosser #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105208
Facility ID: 0322020019
Effective Date: 7/27/2009

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. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written 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. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

c) 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 ORC section 3704.08.
 - (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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. 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.)

10. Applicability

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

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105208
Facility ID: 0322020019
Effective Date: 7/27/2009

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105208
Facility ID: 0322020019
Effective Date: 7/27/2009

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 unit contained in this permit is subject to 40 CFR Part 63, Subpart JJJJ, National Emission Standards for Paper and Other Web Coating: P031. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart JJJJ. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart JJJJ. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart JJJJ and Subpart A.

All the requirements of 40 CFR Part 63, Subpart JJJJ have been established in the administrative modification PTI for this facility. The applicable sections of 40 CFR Part 63, Subpart JJJJ have been cited in the appropriate sections. 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 appropriate Ohio EPA District office or local air agency.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0105208
Facility ID: 0322020019
Effective Date: 7/27/2009

C. Emissions Unit Terms and Conditions



1. P031, Embosser #5

Operations, Property and/or Equipment Description:

Embosser No. 5

- 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(A)(3)(a) [administrative modification of PTI P0103967, issued 04/06/2009, to add opacity limits]	2.02 pounds of VOC per hour and 8.87 tons of VOC per year from adhesive application operations 0.54 pounds of MIBK per you and 2.35 tons of MIBK per year from adhesive application operations 0.37 pounds of VOC per hour and 1.63 tons of VOC per year from cleanup materials 0.37 pounds of toluene per hour and 1.63 tons of toluene per year from cleanup materials 0.67 pounds of VOC per hour and 2.93 tons of VOC per year from embossing with heat operations 0.67 pounds of PE per hour and 2.93 tons of PE per year from embossing with heat operations Visible particulate emissions from the stack serving this emissions unit shall not exceed 5 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-21-09(H)	See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	40 CFR, Part 60, Subpart FFF	See b)(2)b.
f.	40 CFR, Part 63, Subpart JJJJ [40 CFR 63.3280-3420] [In accordance with 40 CFR, 63.3300, these emissions units are web coating lines subject to the emission limitation/control measures specified in Subpart JJJJ.]	Comply with one of the following: Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or Organic HAP emissions shall be limited to no more than 4 percent of coatings applied for the month; or Organic HAP emissions shall be limited to no more than 20 percent of solids applied for the month. Outlet organic HAP concentration of no greater than 20 parts by million by volume (ppmv) by compound on a dry basis and the efficiency of the capture system is 100 percent.
g.	40 CFR 63.1-15 [40 CFR 63.3340]	Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart FFF and 40 CFR, Part 63, Subparts A and JJJJ.
- b. The requirements of this rule are less stringent than the requirements in 40 CFR Part 63 Subpart JJJJ for Paper and other Web Coating.
- c. The emission limitation specified by this rule which is applicable to emissions unit P031, is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. The visible emission limitation specified by this rule which is applicable to emissions unit P031, is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



c) Operational Restrictions

- (1) All of the VOC emissions from emissions units K002, K003, K004, P030 and P031 shall be vented to the regenerative thermal oxidizer (RTO) when one or more of these emissions units are in operation.
- (2) The coating line shall be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO)* shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5% of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and vented to the VOC control device.

By satisfying the above criteria for a permanent total enclosure, the VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

- (3) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as an hourly average (equivalent to at least 200 feet/minute airflow into the permanent total enclosure through all natural draft openings), whenever the emissions unit is in operation and all the VOCs are being vented to the RTO.
- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3321(a)	Requirement to meet operating limits at all times after they are established



d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, in any 3-hour block of time when the emissions units controlled by the RTO are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.
- (2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee and prior approval by the Northwest District Office.
- (3) The permittee shall collect and record the following information for each day for the control equipment:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

- (4) Whenever the monitored average combustion temperature within the RTO deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.
- (5) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:



- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (6) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- (7) The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- (8) The permittee shall record and maintain on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day.
- (9) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3350(a)	Summary of monitoring required
63.3350(b)	Requirement to install and operate monitoring equipment
63.3350(e)	Requirements for continuous parameter monitoring system (CPMS)
63.3350(f)	Requirements for capture system monitoring



63.3410(a)	Recordkeeping requirements
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e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;
 - c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;
 - d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section c)(4) of the terms and conditions of this permit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- (5) All quarterly reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.



- (6) 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 sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3400(a)	Requirement to submit reports
63.3400(b)	Requirement to submit initial notification
63.3400(c)	Requirement to submit semi-annual compliance reports
63.3400(d)	Requirement to submit a Notification of Performance Tests
63.3400(e)	Requirement to submit a Notification of Compliance Status
63.3400(f)	Requirement to submit performance test reports
63.3400(g)	Requirement to submit startup, shutdown, and malfunction reports

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after commencing operation of this emissions unit, and every two and a half years thereafter, unless otherwise approved by Ohio EPA, NWDO.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations, as well as mass emission limitations for VOC and HAP (P030 and P031) and PE (P031).
 - c. The following test method(s) shall be employed to demonstrate compliance with the emission limitations: Methods 1-4, 18 and 25 or 25A of 40 CFR Part 60, for P030 and P031, and Method 5, for P031. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may



- approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10, 40 CFR Part 60 Subpart JJJJ or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - f. The testing shall be conducted while the emissions unit is operating at or near maximum VOC loading conditions, unless otherwise specified or approved by the Northwest District Office. The operating scenario may also require the permittee to test this emissions unit at normal VOC loading conditions to demonstrate worst-case loading conditions.
 - g. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northwest District Office's refusal to accept the results of the emission test(s).
 - h. Personnel from the Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northwest District Office.
- (2) Compliance with the emissions limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
- a. Emission Limitation:

7.53 pounds of volatile organic compounds (VOC) per hour and 33.00 tons of VOC per year from adhesive application operations associated with emissions unit P030; and 2.02 pounds of volatile organic compounds (VOC) per hour and 8.87 tons of VOC per year from adhesive application operations associated with emissions unit P031



Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section f)(1).

The annual limitation was developed by multiplying the potential lbs/hr emission rate by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

b. Emission Limitation:

3.10 pounds of xylene per hour and 13.59 tons of xylene per year from adhesive application operations associated with emissions unit P030

c. Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section f)(1).

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

d. Emission Limitation:

1.33 pounds of MIBK per hour and 5.82 tons of MIBK per year from adhesive application operations associated with emissions unit P030; and 0.54 pounds of MIBK per hour and 2.35 tons of MIBK per year from adhesive application operations

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section f)(1).

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

e. Emission Limitation:

0.37 pounds of VOC per hour and 1.63 tons of VOC per year from cleanup materials



Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section f)(1).

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

f. Emission Limitation:

0.37 pounds of toluene per hour and 1.63 tons of toluene per year from cleanup materials

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section f)(1).

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

g. Emission Limitation:

0.67 pounds of VOC per hour and 2.93 tons of VOC per year from embossing with heat operations associated with emissions unit P031

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section f)(1).

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

h. Emission Limitation:

0.67 pounds of PE per hour and 2.93 tons of PE per year from embossing with heat operations associated with emissions unit P031

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section f)(1).



The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

i. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 5 percent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

j. Emission Limitation:

Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 2 percent of the organic HAP applied for each month (98 percent reduction) for each month at new affected sources; or

Organic HAP emissions are limited to no more than 1.6% of coating applied for each month; or

Organic HAP emissions are limited to no more than 8% of solids applied for each month.

Outlet organic HAP concentration of no greater than 20 parts by million by volume (ppmv) by compound on a dry basis and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the testing requirements specified in section f)(1), the compliance procedures and performance test methods specified in section f)(3), and the monitoring and recordkeeping requirements in section d)(9).

- (3) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR, 63 Subpart JJJJ, including the following sections:

Subpart JJJJ section	Subpart JJJJ requirement
63.3360(e)	Establishing control device efficiency
63.3360(f)	Establishing capture efficiency
63.3370(a)(4)	Summary of methods to demonstrate compliance using capture system and control device



63.3370(e), and (k)	Methodology to determine compliance with 63.3320(b)(1) using an oxidizer as described in (k)
63.3370(f) and (k)	Methodology to determine compliance with 63.3320(b)(3) using an oxidizer as described in (k)
63.3370(g) and (k)	Methodology to determine compliance with 63.3320(b)(2) using an oxidizer as described in (k)
63.3370(h) and (k)	Methodology to determine compliance with monthly organic HAP emission rate using an oxidizer as described in (k)

g) Miscellaneous Requirements

- (1) None.