



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

8/3/2009

David Podolka  
Morgan Adhesives Company (MACtac)  
4560 Darrow Road  
Stow, OH 44224

Certified Mail  
Facility ID: 1677110026  
Permit Number: P0103400  
County: Summit

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Akron Beacon Journal. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 W. Town St., 7<sup>th</sup> Floor  
Columbus, Ohio 43215

and Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
ARAQMD; Pennsylvania; West Virginia

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



PUBLIC NOTICE  
ISSUANCE OF DRAFT AIR POLLUTION Title V Permit  
Morgan Adhesives Company (MACtac)

Issue Date: 8/3/2009  
Permit Number: P0103400  
Permit Type: Renewal  
Permit Description: pressure sensitive web coating  
Facility ID: 1677110026  
Facility Location: Morgan Adhesives Company (MACtac)  
4560 Darrow Road,  
Stow, OH 44224  
Facility Description: Coated and Laminated Paper Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control Title V operating permit for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Sean Vadas at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Draft Title V Permit  
Permit Number: P0103400  
Facility ID: 1677110026

## Statement of Basis For Title V Permit

Company Name	<b>Morgan Adhesives Company (MACTac)</b>	
Premise Number	<b>16-77-11-0026</b>	
What makes this facility a Title V facility?	VOC	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
1	25		Emission control action program must be submitted.
2		40 CFR Part 63	Subpart JJJJ MACT requirements
3		40 CFR Part 63	Subpart A, general provisions

**Instructions for Part II:**



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Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

Part III (Requirements Within the State & Federally Enforceable Section)															
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745- )	Other												
04, and K006 - K009	The requirements of this rule have been replaced by the requirements specified in the facility specific SIP revision approved by USEPA.	21-09(F)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR: For carbon adsorption - avg. VOC conc in exhaust gas shall not exceed 20% greater than the avg conc during most recent stack test.</p> <p>For catalytic incinerator - avg temp of exhaust gas shall not be more than 50F below avg value during most recent stack test.</p>



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K011	2.9 lbs VOC per gallon of coating	21-09(F)		N	N	N	N	N	Y	N	Y	N	N	N	<p>M - No monitoring requirements are needed as compliance is demonstrated with record keeping.</p> <p>ET - Permittee shall demonstrate compliance through record keeping requirements. Method 5 testing is not currently being required.</p>
K004 - K006, K008, K009	The requirements of this rule have been replaced by the requirements specified in the facility specific SIP revision approved by USEPA.	21-09(H)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR: For carbon adsorption - avg. VOC conc in exhaust gas shall not exceed 20% greater than the avg conc during most recent stack test.</p> <p>For catalytic incinerator - avg temp of exhaust gas shall not be more than 50F below avg value during most recent stack test.</p>



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K009	Exempt, < 400 kg per month of HAP on printing stations		40 CFR Part 63, Subp art KK	N	Y	Y	N	N	Y	N	Y	N	N	N	M - No monitoring requirements are needed as compliance is demonstrated with record keeping.  ET - Permittee shall demonstrate compliance through record keeping requirements. Method 5 testing is not currently being required.
K015	0.002 # VOC per lb of coating solids,	3745- 31- 05(A)(3 )		N	N	Y	N	N	Y	N	Y	N	N	N	ET - Permittee shall demonstrate compliance through record keeping requirements.
K015	19.2 # VOC/day & 5.8 tpy VOC	3745- 31- 05(A)(3 )		N	N	Y	N	N	Y	N	Y	N	N	N	ET - Permittee shall demonstrate compliance through record keeping requirements.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

**Instructions for Part III:**

All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.



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**Permit Number:** P0103400  
**Facility ID:** 1677110026

If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.





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**DRAFT**

**Air Pollution Title V Permit**  
for  
Morgan Adhesives Company (MACtac)

Facility ID: 1677110026  
Permit Number: P0103400  
Permit Type: Renewal  
Issued: 8/3/2009  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
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**Air Pollution Title V Permit**  
for  
Morgan Adhesives Company (MACTac)

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**Draft Title V Permit**

**Permit Number:** P0103400

**Facility ID:** 1677110026

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1677110026  
Facility Description: Pressure Sensitive Laminates.  
Application Number(s): A0035277  
Permit Number: P0103400  
Permit Description: pressure sensitive web coating  
Permit Type: Renewal  
Issue Date: 8/3/2009  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number:

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

Morgan Adhesives Company (MACtac)  
4560 Darrow Road  
Stow, OH 44224

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

Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308  
(330)375-2480

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 Akron Regional Air Quality Management District. 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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0103400

**Facility ID:** 1677110026

**Effective Date:** To be entered upon final issuance

## **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 Akron Regional Air Quality Management District.

*(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 contaminant 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.



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Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0103400

**Facility ID:** 1677110026

**Effective Date:** To be entered upon final issuance

## **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) B.5.

2. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. The emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

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

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJ: K004, K006 – K009, K011, and K015. 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.

(Authority for term: 40 CFR Part 63)

4. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart KK: K004 and K009. 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.

(Authority for term: 40 CFR Part 63)

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

- B018 - Industrial Reliance Boiler (B-12) - 8,400,000 Btu/hr;
- B019 - Industrial Reliance Boiler (B-13) - 8,400,000 Btu/hr;
- B020 - Industrial Reliance Boiler (B-14) - 8,400,000 Btu/hr;
- Z001 - R&D Pilot Coater;
- Z002 - Mixing Tank A-1 Cmpd Room A, 1100-gal;
- Z003 - Mixing Tank A-2 Cmpd Room A, 1100-gal;
- Z004 - Mixing Tank A-3 Cmpd Room A, 1100-gal;
- Z005 - Mixing Tank A-4 Cmpd Room A, 1100-gal;
- Z006 - Mixing Tank A-5 Cmpd Room A, 1100-gal;
- Z007 - Mixing Tank A-6 Cmpd Room A, 1100-gal;
- Z008 - Mixing Tank A-7 Cmpd Room A, 1100-gal;
- Z009 - Mixing Tank A-8 Cmpd Room A, 1100-gal;
- Z010 - Feed Tank A-9 Cmpd Room A, 1100-gal;
- Z011 - Feed Tank A-10 Cmpd Room A, 1100-gal;
- Z012 - Feed Tank A-11 Cmpd Room A, 1100-gal;
- Z013 - Feed Tank A-12 Cmpd Room A, 1100-gal;
- Z014 - Compound Room R;
- Z015 - Underground Storage Tank T01, 10,000-gal;
- Z016 - Underground Storage Tank T02, 10,000-gal;
- Z017 - Underground Storage Tank T03, 10,000-gal;
- Z018 - Underground Storage Tank T04 10,000-gal;
- Z019 - Underground Storage Tank T05, 10,000-gal;



- Z020 - Underground Storage Tank T06, 10,000-gal;
- Z021 - Mixing Tank B-1 Cmpd Room B, 1100-gal;
- Z022 - Mixing Tank B-2 Cmpd Room B, 1100-gal;
- Z023 - Mixing Tank B-3 Cmpd Room B, 1100-gal;
- Z024 - Mixing Tank B-4 Cmpd Room B, 1100-gal;
- Z025 - Mixing Tank B-5 Cmpd Room B, 1100-gal;
- Z026 - Mixing Tank B-6 Cmpd Room B, 1100-gal;
- Z027 - Mixing Tank B-7 Cmpd Room B, 1100-gal;
- Z028 - Mixing Tank B-8 Cmpd Room B, 1100-gal;
- Z029 - Mixing Tank B-9 Cmpd Room B, 1700-gal;
- Z030 - Storage Tank C-7 Cmpd Room B-Annex, 5900-gal;
- Z031 - Storage Tank C-8 Cmpd Room B-Annex, 5900-gal;
- Z032 - Storage Tank C-9 Cmpd Room B-Annex, 5900-gal;
- Z033 - Rubber Grinder;
- Z034 - Storage Tank C-10 Cmpd Room B-Annex;
- Z035 - Storage Tank C-1 Cmpd Room C, 1530-gal;
- Z036 - Storage Tank C-2 Cmpd Room C, 1530-gal;
- Z037 - Storage Tank C-11 Cmpd Room C-Annex, 5500-gal;
- Z038 - Storage Tank C-12 Cmpd Room C-Annex, 5500-gal;
- Z039 - Storage Tank C-13 Cmpd Room C-Annex, 5500-gal;
- Z040 - Storage Tank C-14 Cmpd Room C-Annex, 5500-gal;
- Z041 - Storage Tank C-15 Cmpd Room C-Annex, 5500-gal;
- Z042 - Storage Tank C-16 Cmpd Room C-Annex, 5500-gal;
- Z043 - Storage Tank C-17 Cmpd Room C-Annex, 5500-gal;
- Z044 - Storage Tank C-18 Cmpd Room C-Annex, 5500-gal;
- Z045 - Compound Room R;
- Z047 - Storage Tank V-2, 500-gal;
- Z048 - Storage Tank V-3, 1100-gal;
- Z049 - Storage Tank V-4, 1100-gal;
- Z050 - Gravure Roll/Mayer Rod Cleaning Station, CS-1;
- Z051 - Solvent Recovery Decanter Tank, D-4;
- Z052 - Solvent Recovery Dirty Solvent Collection Tank, D-5;
- Z053 - Solvent Recovery Seal Tank, D-7;
- Z054 - Solvent Recovery - Dirty Solvent Feed Tank, D-8;
- Z055 - PRI Distillation Unit, P-3;
- Z056 - Distilled Solvent Collection and Feed Tank, D10;
- Z057 - Laboratory Environmental Test Chambers;
- Z058 - Laboratory Fume Hood-Casting Room;
- Z059 - Laboratory Bench top UV Curing Oven;
- Z060 - Environmental Test Chambers (2);
- Z061 - R&D Test Oven;
- Z062 - Pilot Plant Cleaning/Testing Bench;
- Z063 - R&D Hot Melt Adhesive Mixer, and Coater;
- Z064 - R&D Corona Treater;
- Z065 - R&D Screen Printing Unit;
- Z066 - R&D Casting Room Ovens;
- Z067 - QA Lab Fume Hood and Test Ovens;
- Z068 - QA Lab Fume Hood and Test Oven;
- Z069 - QA Lab Ovens;
- Z070 - Bottling Cage;
- Z071 - Welding Hood - Maintenance;



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- Z074 - Burnham Hot Water Boiler B-1, 1,326,000 Btu/hr;
- Z075 - Burnham Hot Water Boiler B-2, 1,326,000 Btu/hr;
- Z076 - American Standard Hot Water Boiler B-3, 780,000 Btu/hr;
- Z077 - T-01;
- Z078 - T-02;
- Z079 - T-03;
- Z080 - T-04; and
- Z082 - T-06.



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## **C. Emissions Unit Terms and Conditions**



**1. K004, Coating Line E**

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

Coating Line E. Pressure sensitive coater that coats solvent based adhesives and releases. All adhesives and releases are recovered via a solvent recovery system. Primers, inks and topcoats are usually water based and are vented to atmosphere. All ovens combined rated at 3.0 MMBtu/hr.

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 3745-21-09(F)	See b)(2)a. and b)(2)b.
b.	OAC rule 3745-21-09(H)	See b)(2)a. and b)(2)b.
c.	40 CFR Part 63, Subpart KK	exempt  See c)(2)
d.	40 CFR Part 63, Subpart JJJJ	Organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month; or  Organic HAP emissions shall not exceed 20 percent of the mass coating solids applied for each month.
e.	40 CFR 63.1-15	Table 2 to Subpart JJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule have been replaced by the requirements specified in the facility-specific SIP revision approved by USEPA - Region 5 and promulgated in the Federal Register on April 17, 2001 (see 40 CFR Part 52.1870(c)(123)).

b. In lieu of the applicable limitations in OAC rules 3745-21-09(F) and 3745-21-09(H), the actual daily emissions of VOC from all of the emissions units K004



and K006 through K009, calculated in accordance with section d)(3), shall comply each day with the facility-wide, daily allowable VOC emission limitation, calculated in accordance with section d)(2).

The VOC contents of the coating materials shall be determined in accordance with OAC rule 3745-21-10(B) and USEPA Method 24.

c) Operational Restrictions

- (1) For the carbon adsorption system, the average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions units controlled by the carbon adsorption system were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The permittee shall not employ more than 400 kg per month, for every month, of organic HAP on printing stations.

(Authority for term: 40 CFR Part 63, Subpart KK)

- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

Table 1	Operating limits
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(Authority for term: 40 CFR Part 63, Subpart JJJJ)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each coating employed in coating lines K004 and K006 through K009:
  - a. the name and identification number;
  - b. the VOC content, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
  - c. the volume of coating applied, in gallons of coating, excluding water and exempt solvents;
  - d. the density of the VOC content, in pounds of VOC per gallon of VOC; and
  - e. the line in which the coating is applied, and, if applicable, an identification of any VOC control system to which the coating's VOC emissions are being vented;
    - i. if the control system is a carbon adsorber, record whether the VOC in the coating is recoverable or not recoverable via this control technology.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))



- (2) The daily allowable VOC emission limitation for coating lines K004 and K006 through K009 shall be calculated in accordance with the following equation and recorded on a daily basis:

$$Ad = (0.67) \text{ SUMMATION } \sum_{i=1}^n Vi * Li \frac{(D - Ci)}{(D - Li)}$$

where:

Ad = the daily allowable VOC emission limitation for coating lines K004 and K006 through K009, in pounds of VOC;

n = subscript denoting the total number of coatings employed for the day;

i = subscript denoting a specific coating;

V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

C = VOC content of each surface coating applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC in each coating applied, in pounds of VOC per gallon of VOC (for the purpose of calculating Ad, a standard density of 7.36 will be used for all coatings); and

L = the emission limitation for each surface coating applied (this is 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a paper coating, and 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a vinyl coating).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The actual daily VOC emissions (Ed) from coating lines K004 and K006 through K009 shall be determined in accordance with the following equation and recorded on a daily basis:

$$Ed = \text{SUMMATION } \sum_{i=1}^n Vi * Ci * (1 - Fi)$$

where:

Ed = the actual daily VOC emissions from coating lines K004 and K006 through K009, in pounds of VOC;

n = subscript denoting the total number of coatings employed for the day;

i = subscript denoting a specific coating;



- (4) V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

C = VOC content of each surface coating as applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and

F = fraction, by weight, of VOC emissions from the coating reduced or prevented from being emitted to the ambient air (this is the overall efficiency of the capture system and control device).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (5) The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions units controlled by the carbon adsorption system are in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. a log of the periods of time when the capture (collection) system, control device, and monitoring equipment were not operating and the associated emissions units were in operation; and
- b. all 3-hour blocks of time (when the emissions units were in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (6) The permittee also shall collect and record the following information each day for the carbon adsorption system:
- a. the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds per day (T);
  - b. the rolling, 7-day summation of the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds (T7);
  - c. the amount of VOC recovered by the carbon adsorption system, in pounds per day (VOCrec);
  - d. the rolling, 7-day summation of the amount of VOC recovered by the carbon adsorption system, in pounds (VOCrec,7); and



- e. the rolling, 7-day average overall, fractional control efficiency of the carbon adsorption system (SRE7).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (7) The overall control efficiency of the carbon adsorption system shall be determined each day by directly comparing the input liquid VOC to the recovered liquid VOC. The procedure for use in this situation is specified in 40 CFR 60.443 with the following modifications: The permittee shall obtain data each day for the solvent usage and solvent recovery and determine the solvent recovery efficiency of the system each day using a rolling, 7-day period. The recovery efficiency for each day is computed as the ratio of the total recovered solvent for that day and the prior 6 consecutive operating days to the total solvent usage for the same 7-day period used for the recovered solvent, rather than a 30-day weighted average as given in 40 CFR 60.433. This ratio shall be expressed as a percentage. This shall be done within 72 hours following each 24-hour period.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (8) The permittee shall maintain records of the total volume and organic HAP content of each material applied in the printing stations during each month.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63)

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

63.3350(a)(1) and (c)	Monitor any exhaust flow bypass of control devices
63.3350(a)(2) and (d)	Install, operate, and maintain CEMS on solvent recovery
63.3350(a)(3) and (e)	Install, operate, and maintain CPMS
63.3350(a)(2) and (f)	Capture system monitoring
63.3370	Calculate HAP emissions
63.3410(a) and 63.3410(b)	Required overall records that should be maintained.
Table 1	Monitoring requirements for control devices

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

e) Reporting Requirements

- (1) In lieu of the applicable reporting requirements in OAC rule 3745-21-09(B)(3), the permittee shall submit quarterly deviation (excursion) reports that identify any daily



record that demonstrates a failure to comply with the daily allowable VOC emission limitation calculated each day in accordance with the equation specified in d)(2).

Each quarterly deviation report also shall include the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

If no excursions occur during a calendar quarter, the permittee shall submit a report stating such, along with the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by the carbon adsorption system were in operation during which the average VOC concentration of the exhaust gases from the carbon adsorption system exceeded the concentration limitation specified in section C.1.c)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.

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

- (4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that more than 400 kg of organic HAP was employed in the printing station. 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 40 CFR Part 63)

- (5) 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:

63.3400(c)	Semi-annual compliance report
63.3400(g)	Start-up shutdown, malfunction reports
63.3350(f)	Monitoring plan

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

f) Testing Requirements

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



a. Emission Limitation:

facility-wide daily allowable VOC emission limitation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(2) and d)(3).

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

(2) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to determine the control efficiency of the catalytic incinerators and the carbon adsorption system, the capture efficiency for coating lines vented to the catalytic incinerators and the carbon adsorption system, and the percent overall VOC emissions reduction of the carbon adsorption system.
- c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C) or such alternatives approved by USEPA. 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.
- 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 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 percent overall VOC emission reduction of the carbon adsorption system shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.443 with a rolling, 7-day average, as specified in section d)(6).

All testing must follow the requirements of OAC rule 3745-21-10(A).

- f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.



Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- g) Miscellaneous Requirements
  - (1) None.



**2. K006, Coating Line G**

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

Coating Line G. Pressure sensitive coater for primarily technical pressure sensitive products. Coatings are primarily solvent-based. Adhesive, primer and topcoat coating emissions are routed to a catalytic oxidizer. All but one silicone release coating can be recovered. All ovens combined rated at 3.0 MMBtu/hr.

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 3745-21-09(F)	See b)(2)a and b)(2)b below.
b.	OAC rule 3745-21-09(H)	See b)(2)a and b)(2)b below.
c.	40 CFR Part 63, Subpart JJJJ	Organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month; or  Organic HAP emissions shall not exceed 20 percent of the mass coating solids applied for each month.
d.	40 CFR 63.1-15	Table 2 to Subpart JJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule have been replaced by the requirements specified in the facility-specific SIP revision approved by USEPA - Region 5 and promulgated in the Federal Register on April 17, 2001 (see 40 CFR Part 52.1870(c)(123)).

b. In lieu of the applicable limitations in OAC rules 3745-21-09(F) and 3745-21-09(H), the actual daily emissions of VOC from all of the emissions units K004 and K006 through K009 at MACtac, calculated in accordance with section C.2.d)(3), shall comply each day with the facility-wide, daily allowable VOC emission limitation, calculated in accordance with section d)(2).



The VOC contents of the coating materials shall be determined in accordance with OAC rule 3745-21-10(B) and USEPA Method 24.

c) Operational Restrictions

- (1) For the carbon adsorption system, the average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions units controlled by the carbon adsorption system were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (2) For each catalytic incinerator, the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions units controlled by a catalytic incinerator are in operation and employing VOC-containing coatings, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (3) Each catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in each catalytic incinerator, as determined during the annual catalytic activity test, shall be at least 90% at the test temperature equal to that temperature at which the inlet to the catalyst bed is set.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3321(a)	Temperature inlet to catalyst bed for oxidizer
63.3360(e)(3)(ii)(D)	Maintain inspection and maintenance plan for catalytic oxidizers.
Table 1	Operating limits

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each coating employed in coating lines K004 and K006 through K009:
  - a. the name and identification number;



- b. the VOC content, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
- c. the volume of coating applied, in gallons of coating, excluding water and exempt solvents;
- d. the density of the VOC content, in pounds of VOC per gallon of VOC; and
- e. the line in which the coating is applied, and, if applicable, an identification of any VOC control system to which the coating's VOC emissions are being vented;
  - i. if the control system is a carbon adsorber, record whether the VOC in the coating is recoverable or not recoverable via this control technology.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The daily allowable VOC emission limitation for coating lines K004 and K006 through K009 shall be calculated in accordance with the following equation and recorded on a daily basis:

$$Ad = (0.67) \sum_{i=1}^n Vi * Li \frac{(D - Ci)}{(D - Li)}$$

where:

Ad = the daily allowable VOC emission limitation for coating lines K003 through K009, in pounds of VOC;

n = subscript denoting the total number of coatings employed for the day;

i = subscript denoting a specific coating;

V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

C = VOC content of each surface coating applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC in each coating applied, in pounds of VOC per gallon of VOC (for the purpose of calculating Ad, a standard density of 7.36 will be used for all coatings); and

L = the emission limitation for each surface coating applied (this is 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a paper coating, and 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a vinyl coating).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The actual daily VOC emissions (Ed) from coating lines K004 and K006 through K009 shall be determined in accordance with the following equation and recorded on a daily



basis:

$$E_d = \text{SUMMATION}_{i=1}^n V_i \cdot C_i \cdot (1 - F_i)$$

where:

$E_d$  = the actual daily VOC emissions from coating lines K003 through K009, in pounds of VOC;

$n$  = subscript denoting the total number of coatings employed for the day;

$i$  = subscript denoting a specific coating;

$V$  = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

$C$  = VOC content of each surface coating as applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and

$F$  = fraction, by weight, of VOC emissions from the coating reduced or prevented from being emitted to the ambient air (this is the overall efficiency of the capture system and control device).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions units controlled by the carbon adsorption system are in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. a log of the periods of time when the capture (collection) system, control device, and monitoring equipment were not operating and the associated emissions units were in operation; and
- b. all 3-hour blocks of time (when the emissions units were in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))



- (5) The permittee also shall collect and record the following information each day for the carbon adsorption system:
- a. the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds per day (T);
  - b. the rolling, 7-day summation of the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds (T7);
  - c. the amount of VOC recovered by the carbon adsorption system, in pounds per day (VOCrec);
  - d. the rolling, 7-day summation of the amount of VOC recovered by the carbon adsorption system, in pounds (VOCrec,7); and
  - e. the rolling, 7-day average overall, fractional control efficiency of the carbon adsorption system (SRE7).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (6) The overall control efficiency of the carbon adsorption system shall be determined each day by directly comparing the input liquid VOC to the recovered liquid VOC. The procedure for use in this situation is specified in 40 CFR 60.443 with the following modifications: The permittee shall obtain data each day for the solvent usage and solvent recovery and determine the solvent recovery efficiency of the system each day using a rolling, 7-day period. The recovery efficiency for each day is computed as the ratio of the total recovered solvent for that day and the prior 6 consecutive operating days to the total solvent usage for the same 7-day period used for the recovered solvent, rather than a 30-day weighted average as given in 40 CFR 60.433. This ratio shall be expressed as a percentage. This shall be done within 72 hours following each 24-hour period.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (7) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of each catalytic incinerator's catalyst bed when the emissions units controlled with the catalytic incinerators are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. all 3-hour blocks of time (when any emissions unit was in operation and employing VOC-containing coatings) during which the average temperature of the exhaust gases immediately before any catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance;



- b. a log of the periods of time when any temperature monitoring device was not operating and the associated emissions unit(s) was/were in operation; and
- c. a log of the periods of time when any catalytic oxidizer alarm system indicates a malfunction of any catalytic oxidizer or an indication from any catalytic oxidizer fail-safe control system that the capacity of any catalytic oxidizer has been exceeded.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (8) The permittee shall perform a preventive maintenance inspection of each catalytic incinerator on an annual basis to evaluate the performance of each catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventive maintenance checklist submitted to the Ohio EPA on February 12, 1999, and shall include a physical inspection of each unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations. Repair and replacement of equipment shall be performed as necessitated by the inspection. Samples of catalyst material shall be collected from each catalyst bed to perform the catalyst activity test described in section f)(3).

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in section f)(3).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

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

63.3350(a)(1) and (c)	Monitor any exhaust flow bypass of control devices
63.3350(a)(2) and (d)	Install, operate, and maintain CEMS on solvent recovery
63.3350(a)(3) and (e)	Install, operate, and maintain CPMS
63.3350(e)(9)	Monitor temperature rise across catalyst on oxidizer
63.3350(a)(2) and (f)	Capture system monitoring
63.3370	Calculate HAP emissions
63.3410(a) and 63.3410(b)	Required overall records that should be maintained.
Table 1	Monitoring requirements for control devices



(Authority for term: 40 CFR Part 63, Subpart JJJJ)

e) Reporting Requirements

- (1) In lieu of the applicable reporting requirements in OAC rule 3745-21-09(B)(3), the permittee shall submit quarterly deviation (excursion) reports that identify any daily record that demonstrates a failure to comply with the daily allowable VOC emission limitation calculated each day in accordance with the equation specified in section d)(2).

Each quarterly deviation report also shall include the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

If no excursions occur during a calendar quarter, the permittee shall submit a report stating such, along with the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by the carbon adsorption system were in operation during which the average VOC concentration of the exhaust gases from the carbon adsorption system exceeded the concentration limitation specified in section c)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by a catalytic incinerator were in operation during which the average temperature of the exhaust gases immediately before any catalyst bed does not comply with the temperature limitation specified in section c)(2).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.

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

- (5) The permittee shall submit an annual report that includes the results of the annual catalyst activity tests required in section f)(3). This annual report shall be submitted within 45 days after each catalyst activity test is performed.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (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:

63.3400(c)	Semi-annual compliance report
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63.3400(g)	Start-up shutdown, malfunction reports
63.3350(f)	Monitoring plan

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

f) Testing Requirements

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

a. Emission Limitation:

facility-wide daily allowable VOC emission limitation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(2) and d)(3).

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

(2) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted to determine the control efficiency of the catalytic incinerators and the carbon adsorption system, the capture efficiency for coating lines vented to the catalytic incinerators and the carbon adsorption system, and the percent overall VOC emissions reduction of the carbon adsorption system.

c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C) or such alternatives approved by USEPA. 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.

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 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 percent overall VOC emission reduction of the carbon adsorption system shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.443 with a rolling, 7-day average, as specified in section d)(6).

All testing must follow the requirements of OAC rule 3745-21-10(A).

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The permittee shall conduct, or have conducted, an annual catalyst activity test using the catalyst sample(s) collected during the annual preventive maintenance inspection described in section d)(8). An intent to test notification shall not be required for the testing noted in this section. The procedure for the catalyst activity test shall be in accordance with the document titled "Catalyst Activity Procedures" as submitted to the Ohio EPA on February 18, 1999.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

g) Miscellaneous Requirements

- (1) None.



**3. K007, Coating Line H**

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

Coating Line H. Pressure sensitive coater producing various types of pressure sensitive products. Coatings are solvent and water-based. Solvent-based adhesives are controlled via catalytic oxidizers or solvent recovery. Water-based adhesive coatings are discharged to atmosphere. All release coatings are recoverable. H-line ovens rated at 2.25 MMBtu/hr.

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 3745-21-09(F)	See b)(2)a and b)(2)b below.
b.	OAC rule 3745-21-09(H)	See b)(2)a and b)(2)b below.
c.	40 CFR Part 63, Subpart JJJJ	Organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month; or  Organic HAP emissions shall not exceed 20 percent of the mass coating solids applied for each month.
d.	40 CFR 63.1-15	Table 2 to Subpart JJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule have been replaced by the requirements specified in the facility-specific SIP revision approved by USEPA - Region 5 and promulgated in the Federal Register on April 17, 2001 (see 40 CFR Part 52.1870(c)(123)).

b. In lieu of the applicable limitations in OAC rules 3745-21-09(F) and 3745-21-09(H), the actual daily emissions of VOC from all of the emissions units K004 and K006 through K009 at MACTac, calculated in accordance with section d)(3), shall comply each day with the facility-wide, daily allowable VOC emission limitation, calculated in accordance with section d)(2).



The VOC contents of the coating materials shall be determined in accordance with OAC rule 3745-21-10(B) and USEPA Method 24.

c) Operational Restrictions

- (1) For the carbon adsorption system, the average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions units controlled by the carbon adsorption system were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (2) For each catalytic incinerator, the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions units controlled by a catalytic incinerator are in operation and employing VOC-containing coatings, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (3) Each catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in each catalytic incinerator, as determined during the annual catalytic activity test, shall be at least 90% at the test temperature equal to that temperature at which the inlet to the catalyst bed is set.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3321(a)	Temperature inlet to catalyst bed for oxidizer
63.3360(e)(3)(ii)(D)	Maintain inspection and maintenance plan for catalytic oxidizers.
Table 1	Operating limits

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each coating employed in coating lines K004, and K006 through K009:
  - a. the name and identification number;



- b. the VOC content, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
- c. the volume of coating applied, in gallons of coating, excluding water and exempt solvents;
- d. the density of the VOC content, in pounds of VOC per gallon of VOC; and
- e. the line in which the coating is applied, and, if applicable, an identification of any VOC control system to which the coating's VOC emissions are being vented;
  - i. if the control system is a carbon adsorber, record whether the VOC in the coating is recoverable or not recoverable via this control technology.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The daily allowable VOC emission limitation for coating lines K004 and K006 through K009 shall be calculated in accordance with the following equation and recorded on a daily basis:

$$Ad = (0.67) \text{ SUMMATION } \sum_{i=1}^n Vi * Li \frac{(D - Ci)}{(D - Li)}$$

where:

Ad = the daily allowable VOC emission limitation for coating lines K003 through K009, in pounds of VOC;

n = subscript denoting the total number of coatings employed for the day;

i = subscript denoting a specific coating;

V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

C = VOC content of each surface coating applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC in each coating applied, in pounds of VOC per gallon of VOC (for the purpose of calculating Ad, a standard density of 7.36 will be used for all coatings); and

L = the emission limitation for each surface coating applied (this is 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a paper coating, and 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a vinyl coating).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The actual daily VOC emissions (Ed) from coating lines K004 and K006 through K009 shall be determined in accordance with the following equation and recorded on a daily



basis:

$$E_d = \text{SUMMATION}_{i=1}^n V_i \cdot C_i \cdot (1 - F_i)$$

where:

$E_d$  = the actual daily VOC emissions from coating lines K003 through K009, in pounds of VOC;

$n$  = subscript denoting the total number of coatings employed for the day;

$i$  = subscript denoting a specific coating;

$V$  = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

$C$  = VOC content of each surface coating as applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and

$F$  = fraction, by weight, of VOC emissions from the coating reduced or prevented from being emitted to the ambient air (this is the overall efficiency of the capture system and control device).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions units controlled by the carbon adsorption system are in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. a log of the periods of time when the capture (collection) system, control device, and monitoring equipment were not operating and the associated emissions units were in operation; and
- b. all 3-hour blocks of time (when the emissions units were in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))



- (5) The permittee also shall collect and record the following information each day for the carbon adsorption system:
- a. the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds per day (T);
  - b. the rolling, 7-day summation of the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds (T7);
  - c. the amount of VOC recovered by the carbon adsorption system, in pounds per day (VOCrec);
  - d. the rolling, 7-day summation of the amount of VOC recovered by the carbon adsorption system, in pounds (VOCrec,7); and
  - e. the rolling, 7-day average overall, fractional control efficiency of the carbon adsorption system (SRE7).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (6) The overall control efficiency of the carbon adsorption system shall be determined each day by directly comparing the input liquid VOC to the recovered liquid VOC. The procedure for use in this situation is specified in 40 CFR 60.443 with the following modifications: The permittee shall obtain data each day for the solvent usage and solvent recovery and determine the solvent recovery efficiency of the system each day using a rolling, 7-day period. The recovery efficiency for each day is computed as the ratio of the total recovered solvent for that day and the prior 6 consecutive operating days to the total solvent usage for the same 7-day period used for the recovered solvent, rather than a 30-day weighted average as given in 40 CFR 60.433. This ratio shall be expressed as a percentage. This shall be done within 72 hours following each 24-hour period.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (7) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of each catalytic incinerator's catalyst bed when the emissions units controlled with the catalytic incinerators are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. all 3-hour blocks of time (when any emissions unit was in operation and employing VOC-containing coatings) during which the average temperature of the exhaust gases immediately before any catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance;



- b. a log of the periods of time when any temperature monitoring device was not operating and the associated emissions unit(s) was/were in operation; and
- c. a log of the periods of time when any catalytic oxidizer alarm system indicates a malfunction of any catalytic oxidizer or an indication from any catalytic oxidizer fail-safe control system that the capacity of any catalytic oxidizer has been exceeded.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (8) The permittee shall perform a preventive maintenance inspection of each catalytic incinerator on an annual basis to evaluate the performance of each catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventive maintenance checklist submitted to the Ohio EPA on February 12, 1999, and shall include a physical inspection of each unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations. Repair and replacement of equipment shall be performed as necessitated by the inspection. Samples of catalyst material shall be collected from each catalyst bed to perform the catalyst activity test described in section f)(3).

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in section f)(3).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

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

63.3350(a)(1) and (c)	Monitor any exhaust flow bypass of control devices
63.3350(a)(2) and (d)	Install, operate, and maintain CEMS on solvent recovery
63.3350(a)(3) and (e)	Install, operate, and maintain CPMS
63.3350(e)(9)	Monitor temperature rise across catalyst on oxidizer
63.3350(a)(2) and (f)	Capture system monitoring
63.3370	Calculate HAP emissions
63.3410(a) and 63.3410(b)	Required overall records that should be maintained.
Table 1	Monitoring requirements for control devices



(Authority for term: 40 CFR Part 63, Subpart JJJJ)

e) Reporting Requirements

- (1) In lieu of the applicable reporting requirements in OAC rule 3745-21-09(B)(3), the permittee shall submit quarterly deviation (excursion) reports that identify any daily record that demonstrates a failure to comply with the daily allowable VOC emission limitation calculated each day in accordance with the equation specified in section d)(2).

Each quarterly deviation report also shall include the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

If no excursions occur during a calendar quarter, the permittee shall submit a report stating such, along with the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by the carbon adsorption system were in operation during which the average VOC concentration of the exhaust gases from the carbon adsorption system exceeded the concentration limitation specified in section c)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by a catalytic incinerator were in operation during which the average temperature of the exhaust gases immediately before any catalyst bed does not comply with the temperature limitation specified in section c)(2).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.

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

- (5) The permittee shall submit an annual report that includes the results of the annual catalyst activity tests required in section C.3.f)(3). This annual report shall be submitted within 45 days after each catalyst activity test is performed.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (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:

63.3400(c)	Semi-annual compliance report
63.3400(g)	Start-up shutdown, malfunction reports



63.3350(f)	Monitoring plan
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(Authority for term: 40 CFR Part 63, Subpart JJJJ)

f) Testing Requirements

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

a. Emission Limitation:

facility-wide daily allowable VOC emission limitation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(2) and d)(3).

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

(2) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted to determine the control efficiency of the catalytic incinerators and the carbon adsorption system, the capture efficiency for coating lines vented to the catalytic incinerators and the carbon adsorption system, and the percent overall VOC emissions reduction of the carbon adsorption system.

c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C) or such alternatives approved by USEPA. 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.

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 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 percent overall VOC emission reduction of the carbon adsorption system shall be determined in accordance with the test methods and procedures



- f. specified in 40 CFR Part 60.443 with a rolling, 7-day average, as specified in section C.3.d)(6).

All testing must follow the requirements of OAC rule 3745-21-10(A).

- g. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.  
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The permittee shall conduct, or have conducted, an annual catalyst activity test using the catalyst sample(s) collected during the annual preventive maintenance inspection described in section C.3.d)(8). An intent to test notification shall not be required for the testing noted in this section. The procedure for the catalyst activity test shall be in accordance with the document titled "Catalyst Activity Procedures" as submitted to the Ohio EPA on February 18, 1999.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

g) Miscellaneous Requirements

- (1) None.



**4. K008, Coating Line J**

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

Coating Line J. Pressure sensitive coater producing technical pressure sensitive products. Coatings are solvent and water-based. Solvent-based adhesive coatings are controlled via catalytic oxidizers. Water-based adhesive coatings are discharged to atmosphere. All release coatings are recoverable. All ovens combined rated at 18 MMBtu/hr.

- 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 3745-21-09(F)	See b)(2)a and b)(2)b below.
b.	OAC rule 3745-21-09(H)	See b)(2)a and b)(2)b below.
c.	40 CFR Part 63, Subpart JJJJ	Organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month; or  Organic HAP emissions shall not exceed 20 percent of the mass coating solids applied for each month.
d.	40 CFR 63.1-15	Table 2 to Subpart JJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

- (2) Additional Terms and Conditions
  - a. The requirements of this rule have been replaced by the requirements specified in the facility-specific SIP revision approved by USEPA - Region 5 and promulgated in the Federal Register on April 17, 2001 (see 40 CFR Part 52.1870(c)(123)).
  - b. In lieu of the applicable limitations in OAC rules 3745-21-09(F) and 3745-21-09(H), the actual daily emissions of VOC from all of the emissions units K004 and K006 through K009 at MACtac, calculated in accordance with section C.4.d)(3), shall comply each day with the facility-wide, daily allowable VOC emission limitation, calculated in accordance with section C.4.d)(2).



The VOC contents of the coating materials shall be determined in accordance with OAC rule 3745-21-10(B) and USEPA Method 24.

c) Operational Restrictions

- (1) For the carbon adsorption system, the average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions units controlled by the carbon adsorption system were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (2) For each catalytic incinerator, the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions units controlled by a catalytic incinerator are in operation and employing VOC-containing coatings, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (3) Each catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in each catalytic incinerator, as determined during the annual catalytic activity test, shall be at least 90% at the test temperature equal to that temperature at which the inlet to the catalyst bed is set.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3321(a)	Temperature inlet to catalyst bed for oxidizer
63.3360(e)(3)(ii)(D)	Maintain inspection and maintenance plan for catalytic oxidizers.
Table 1	Operating limits

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each coating employed in coating lines K004 and K006 through K009:
  - a. the name and identification number;



- b. the VOC content, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
- c. the volume of coating applied, in gallons of coating, excluding water and exempt solvents;
- d. the density of the VOC content, in pounds of VOC per gallon of VOC; and
- e. the line in which the coating is applied, and, if applicable, an identification of any VOC control system to which the coating's VOC emissions are being vented;
  - i. if the control system is a carbon adsorber, record whether the VOC in the coating is recoverable or not recoverable via this control technology.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The daily allowable VOC emission limitation for coating lines K004 and K006 through K009 shall be calculated in accordance with the following equation and recorded on a daily basis:

$$Ad = (0.67) \text{ SUMMATION } \frac{V_i (D - C_i)}{(D - L_i)}$$

where:

Ad = the daily allowable VOC emission limitation for coating lines K003 through K009, in pounds of VOC;

n = subscript denoting the total number of coatings employed for the day;

i = subscript denoting a specific coating;

V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

C = VOC content of each surface coating applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC in each coating applied, in pounds of VOC per gallon of VOC (for the purpose of calculating Ad, a standard density of 7.36 will be used for all coatings); and

L = the emission limitation for each surface coating applied (this is 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a paper coating, and 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a vinyl coating).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The actual daily VOC emissions (Ed) from coating lines K004 and K006 through K009 shall be determined in accordance with the following equation and recorded on a daily



basis:

$$E_d = \text{SUMMATION}_{i=1}^n V_i \cdot C_i \cdot (1 - F_i)$$

where:

$E_d$  = the actual daily VOC emissions from coating lines K003 through K009, in pounds of VOC;

$n$  = subscript denoting the total number of coatings employed for the day;

$i$  = subscript denoting a specific coating;

$V$  = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

$C$  = VOC content of each surface coating as applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and

$F$  = fraction, by weight, of VOC emissions from the coating reduced or prevented from being emitted to the ambient air (this is the overall efficiency of the capture system and control device).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions units controlled by the carbon adsorption system are in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. a log of the periods of time when the capture (collection) system, control device, and monitoring equipment were not operating and the associated emissions units were in operation; and
- b. all 3-hour blocks of time (when the emissions units were in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))



- (5) The permittee also shall collect and record the following information each day for the carbon adsorption system:
- a. the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds per day (T);
  - b. the rolling, 7-day summation of the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds (T7);
  - c. the amount of VOC recovered by the carbon adsorption system, in pounds per day (VOCrec);
  - d. the rolling, 7-day summation of the amount of VOC recovered by the carbon adsorption system, in pounds (VOCrec,7); and
  - e. the rolling, 7-day average overall, fractional control efficiency of the carbon adsorption system (SRE7).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (6) The overall control efficiency of the carbon adsorption system shall be determined each day by directly comparing the input liquid VOC to the recovered liquid VOC. The procedure for use in this situation is specified in 40 CFR 60.443 with the following modifications: The permittee shall obtain data each day for the solvent usage and solvent recovery and determine the solvent recovery efficiency of the system each day using a rolling, 7-day period. The recovery efficiency for each day is computed as the ratio of the total recovered solvent for that day and the prior 6 consecutive operating days to the total solvent usage for the same 7-day period used for the recovered solvent, rather than a 30-day weighted average as given in 40 CFR 60.443. This ratio shall be expressed as a percentage. This shall be done within 72 hours following each 24-hour period.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (7) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of each catalytic incinerator's catalyst bed when the emissions units controlled with the catalytic incinerators are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. all 3-hour blocks of time (when any emissions unit was in operation and employing VOC-containing coatings) during which the average temperature of the exhaust gases immediately before any catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance;



- b. a log of the periods of time when any temperature monitoring device was not operating and the associated emissions unit(s) was/were in operation; and
- c. a log of the periods of time when any catalytic oxidizer alarm system indicates a malfunction of any catalytic oxidizer or an indication from any catalytic oxidizer fail-safe control system that the capacity of any catalytic oxidizer has been exceeded.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (8) The permittee shall perform a preventive maintenance inspection of each catalytic incinerator on an annual basis to evaluate the performance of each catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventive maintenance checklist submitted to the Ohio EPA on February 12, 1999, and shall include a physical inspection of each unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations. Repair and replacement of equipment shall be performed as necessitated by the inspection. Samples of catalyst material shall be collected from each catalyst bed to perform the catalyst activity test described in section f)(3).

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in section f)(3).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

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

63.3350(a)(1) and (c)	Monitor any exhaust flow bypass of control devices
63.3350(a)(2) and (d)	Install, operate, and maintain CEMS on solvent recovery
63.3350(a)(3) and (e)	Install, operate, and maintain CPMS
63.3350(e)(9)	Monitor temperature rise across catalyst on oxidizer
63.3350(a)(2) and (f)	Capture system monitoring
63.3370	Calculate HAP emissions
63.3410(a) and 63.3410(b)	Required overall records that should be maintained.
Table 1	Monitoring requirements for control devices



(Authority for term: 40 CFR Part 63, Subpart JJJJ)

e) Reporting Requirements

- (1) In lieu of the applicable reporting requirements in OAC rule 3745-21-09(B)(3), the permittee shall submit quarterly deviation (excursion) reports that identify any daily record that demonstrates a failure to comply with the daily allowable VOC emission limitation calculated each day in accordance with the equation specified in section d)(2).

Each quarterly deviation report also shall include the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

If no excursions occur during a calendar quarter, the permittee shall submit a report stating such, along with the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by the carbon adsorption system were in operation during which the average VOC concentration of the exhaust gases from the carbon adsorption system exceeded the concentration limitation specified in section c)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by a catalytic incinerator were in operation during which the average temperature of the exhaust gases immediately before any catalyst bed does not comply with the temperature limitation specified in section c)(2).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.

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

- (5) The permittee shall submit an annual report that includes the results of the annual catalyst activity tests required in section f)(3). This annual report shall be submitted within 45 days after each catalyst activity test is performed.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (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:

63.3400(c)	Semi-annual compliance report
63.3400(g)	Start-up shutdown, malfunction reports



63.3350(f)	Monitoring plan
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(Authority for term: 40 CFR Part 63, Subpart JJJJ)

f) Testing Requirements

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

a. Emission Limitation:

facility-wide daily allowable VOC emission limitation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(2) and d)(3).

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

(2) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted to determine the control efficiency of the catalytic incinerators and the carbon adsorption system, the capture efficiency for coating lines vented to the catalytic incinerators and the carbon adsorption system, and the percent overall VOC emissions reduction of the carbon adsorption system.

c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C) or such alternatives approved by USEPA. 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.

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 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 percent overall VOC emission reduction of the carbon adsorption system shall be determined in accordance with the test methods and procedures



- f. specified in 40 CFR Part 60.443 with a rolling, 7-day average, as specified in section d)(6).

All testing must follow the requirements of OAC rule 3745-21-10(A).

- g. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.  
Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The permittee shall conduct, or have conducted, an annual catalyst activity test using the catalyst sample(s) collected during the annual preventive maintenance inspection described in section d)(8). An intent to test notification shall not be required for the testing noted in this section. The procedure for the catalyst activity test shall be in accordance with the document titled "Catalyst Activity Procedures" as submitted to the Ohio EPA on February 18, 1999.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

g) Miscellaneous Requirements

- (1) None.



**5. K009, Coating Line K**

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

Coating Line K. Pressure sensitive coater producing technical pressure sensitive products. Coatings are solvent and water-based. Solvent-based adhesives and topcoats are controlled via catalytic oxidizers. Water-based adhesives, primers, topcoats and inks are discharged to atmosphere. All ovens combined rated at 16.5 MMBtu/hr.

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 3745-21-09(F)	See b)(2)a and b)(2)b below.
b.	OAC rule 3745-21-09(H)	See b)(2)a and b)(2)b below.
c.	40 CFR Part 63, Subpart KK	exempt  See c)(5) below.
d.	40 CFR Part 52.1870(c)(123)	62.5 tpy of volatile organic compounds (VOC)
e.	40 CFR Part 63, Subpart JJJJ	Organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month; or  Organic HAP emissions shall not exceed 20 percent of the mass coating solids applied for each month.
f.	40 CFR 63.1-15	Table 2 to Subpart JJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. The requirements of this rule have been replaced by the requirements specified in the facility-specific SIP revision approved by USEPA - Region 5 and promulgated in the Federal Register on April 17, 2001 (see 40 CFR Part 52.1870(c)(123)).



- b. In lieu of the applicable limitations in OAC rules 3745-21-09(F) and 3745-21-09(H), the actual daily emissions of VOC from all of the emissions units K004 and K006 through K009 at MACTac, calculated in accordance with section d)(3), shall comply each day with the facility-wide, daily allowable VOC emission limitation, calculated in accordance with section d)(2).

The VOC contents of the coating materials shall be determined in accordance with OAC rule 3745-21-10(B) and USEPA Method 24.

c) Operational Restrictions

- (1) For the carbon adsorption system, the average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions units controlled by the carbon adsorption system were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (2) For each catalytic incinerator, the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions units controlled by a catalytic incinerator are in operation and employing VOC-containing coatings, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (3) Each catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst in each catalytic incinerator, as determined during the annual catalytic activity test, shall be at least 90% at the test temperature equal to that temperature at which the inlet to the catalyst bed is set.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (4) Each permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than -0.007 inch of water, whenever the emissions unit controlled by the permanent total enclosures (K009) is in operation and employing VOC-containing coatings, excluding momentary fluctuations resulting from entering and exiting any permanent total enclosure to perform required maintenance or operational activities.

The doors to each permanent total enclosure shall remain in a closed position during the routine operation of emissions unit K009, except to perform required maintenance or operational activities.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

- (5) The permittee shall not employ more than 400 kg per month, for every month, of organic HAP on printing stations.



(Authority for term: 40 CFR Part 63, Subpart KK)

- (6) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJJJ, including the following sections:

63.3321(a)	Temperature inlet to catalyst bed for oxidizer
63.3360(e)(3)(ii)(D)	Maintain inspection and maintenance plan for catalytic oxidizers.
Table 1	Operating limits

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each coating employed in coating lines K004 and K006 through K009:
  - a. the name and identification number;
  - b. the VOC content, in pounds of VOC per gallon of coating, excluding water and exempt solvents;
  - c. the volume of coating applied, in gallons of coating, excluding water and exempt solvents;
  - d. the density of the VOC content, in pounds of VOC per gallon of VOC; and
  - e. the line in which the coating is applied, and, if applicable, an identification of any VOC control system to which the coating's VOC emissions are being vented;
    - i. if the control system is a carbon adsorber, record whether the VOC in the coating is recoverable or not recoverable via this control technology.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The daily allowable VOC emission limitation for coating lines K004 and K006 through K009 shall be calculated in accordance with the following equation and recorded on a daily basis:

$$Ad = (0.67) \sum_{i=1}^n Vi * Li \frac{(D - Ci)}{(D - Li)}$$

where:

Ad = the daily allowable VOC emission limitation for coating lines K003 through K009, in pounds of VOC;



n = subscript denoting the total number of coatings employed for the day;

i = subscript denoting a specific coating;

V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

C = VOC content of each surface coating applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC in each coating applied, in pounds of VOC per gallon of VOC (for the purpose of calculating Ad, a standard density of 7.36 will be used for all coatings); and

L = the emission limitation for each surface coating applied (this is 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a paper coating, and 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a vinyl coating).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

The actual daily VOC emissions (Ed) from coating line K009 and coating lines K004 and K006 through K009 shall be determined in accordance with the following equation and recorded on a daily basis:

$$Ed = \sum_{i=1}^n Vi * Ci * (1 - Fi)$$

where:

Ed = the actual daily VOC emissions from coating line K009 and coating lines K003 through K009, in pounds of VOC;

n = subscript denoting the total number of coatings employed for the day;

i = subscript denoting a specific coating;

V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

C = VOC content of each surface coating as applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and

F = fraction, by weight, of VOC emissions from the coating reduced or prevented from being emitted to the ambient air (this is the overall efficiency of the capture system and control device).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the carbon adsorption system when the emissions units controlled by the carbon



adsorption system are in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. a log of the periods of time when the capture (collection) system, control device, and monitoring equipment were not operating and the associated emissions units were in operation; and
- b. all 3-hour blocks of time (when the emissions units were in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The permittee also shall collect and record the following information each day for the carbon adsorption system:

- a. the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds per day (T);
- b. the rolling, 7-day summation of the total uncontrolled VOC emissions from all the coatings being vented to the carbon adsorption system, in pounds (T7);
- c. the amount of VOC recovered by the carbon adsorption system, in pounds per day (VOCrec);
- d. the rolling, 7-day summation of the amount of VOC recovered by the carbon adsorption system, in pounds (VOCrec,7); and
- e. the rolling, 7-day average overall, fractional control efficiency of the carbon adsorption system (SRE7).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (5) The overall control efficiency of the carbon adsorption system shall be determined each day by directly comparing the input liquid VOC to the recovered liquid VOC. The procedure for use in this situation is specified in 40 CFR 60.443 with the following modifications: The permittee shall obtain data each day for the solvent usage and solvent recovery and determine the solvent recovery efficiency of the system each day using a rolling, 7-day period. The recovery efficiency for each day is computed as the ratio of the total recovered solvent for that day and the prior 6 consecutive operating days to the total solvent usage for the same 7-day period used for the recovered solvent,



rather than a 30-day weighted average as given in 40 CFR 60.443. This ratio shall be expressed as a percentage. This shall be done within 72 hours following each 24-hour period.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (6) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of each catalytic incinerator's catalyst bed when the emissions units controlled with the catalytic incinerators are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day any VOC-containing coatings are employed:

- a. all 3-hour blocks of time (when any emissions unit was in operation and employing VOC-containing coatings) during which the average temperature of the exhaust gases immediately before any catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance;
- b. a log of the periods of time when any temperature monitoring device was not operating and the associated emissions unit(s) was/were in operation; and
- c. a log of the periods of time when any catalytic oxidizer alarm system indicates a malfunction of any catalytic oxidizer or an indication from any catalytic oxidizer fail-safe control system that the capacity of any catalytic oxidizer has been exceeded.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (7) The permittee shall perform a preventive maintenance inspection of each catalytic incinerator on an annual basis to evaluate the performance of each catalyst bed. The inspection shall consist of internal and visual inspections as detailed in the preventive maintenance checklist submitted to the Ohio EPA on February 12, 1999, and shall include a physical inspection of each unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturers recommendations. Repair and replacement of equipment shall be performed as necessitated by the inspection. Samples of catalyst material shall be collected from each catalyst bed to perform the catalyst activity test described in section f)(3).

The permittee shall maintain a record of the results of each annual inspection, as well as the results of each catalyst activity test required in section f)(3).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))



- (8) The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measures the pressure inside and outside of each permanent total enclosure on emissions unit K009 any time VOC-containing coatings are employed. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. .

The permittee shall record and maintain, on a daily basis, the difference in pressure between the permanent total enclosure and the surrounding area(s) when VOC-containing coatings are employed.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (9) The permittee shall maintain records of the total volume and organic HAP content of each material applied in the printing stations during each month.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart KK)

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

63.3350(a)(1) and (c)	Monitor any exhaust flow bypass of control devices
63.3350(a)(2) and (d)	Install, operate, and maintain CEMS on solvent recovery
63.3350(a)(3) and (e)	Install, operate, and maintain CPMS
63.3350(e)(9)	Monitor temperature rise across catalyst on oxidizer
63.3350(a)(2) and (f)	Capture system monitoring
63.3370	Calculate HAP emissions
63.3410(a) and 63.3410(b)	Required overall records that should be maintained.
Table 1	Monitoring requirements for control devices

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

e) Reporting Requirements

- (1) In lieu of the applicable reporting requirements in OAC rule 3745-21-09(B)(3), the permittee shall submit quarterly deviation (excursion) reports that identify any daily record that demonstrates a failure to comply with the daily allowable VOC emission limitation calculated each day in accordance with the equation specified in section d)(2).



Each quarterly deviation report also shall include the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

If no excursions occur during a calendar quarter, the permittee shall submit a report stating such, along with the total annual VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by the carbon adsorption system were in operation during which the average VOC concentration of the exhaust gases from the carbon adsorption system exceeded the concentration limitation specified in section c)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions units controlled by a catalytic incinerator were in operation during which the average temperature of the exhaust gases immediately before any catalyst bed does not comply with the temperature limitation specified in section c)(2).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (4) The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section c)(4).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (5) The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.

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

- (6) The permittee shall submit an annual report that includes the results of the annual catalyst activity tests required in section f)(3). This annual report shall be submitted within 45 days after each catalyst activity test is performed.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (7) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that more than 400 kg of organic HAP was employed in the printing station. 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 40 CFR Part 63, Subpart KK)

- (8) The permittee shall also submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by



January 31 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (9) 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:

63.3400(c)	Semi-annual compliance report
63.3400(g)	Start-up shutdown, malfunction reports
63.3350(f)	Monitoring plan

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

f) Testing Requirements

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

- a. Emission Limitation:

facility-wide daily allowable VOC emission limitation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(2) and d)(3).

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

- b. Emission Limitation:

62.5 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

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

- (2) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

- a. The emission testing shall be conducted no later than 6 months after permit issuance and within within 3 months after issuance of the permit and within 6 months prior to permit renewal.

- b. The emission testing shall be conducted to determine the control efficiency of the catalytic incinerators and the carbon adsorption system, the capture efficiency for



coating lines vented to the catalytic incinerators and the carbon adsorption system, and the percent overall VOC emissions reduction of the carbon adsorption system.

- c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C) or such alternatives approved by USEPA. 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.
- 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 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 percent overall VOC emission reduction of the carbon adsorption system shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.443 with a rolling, 7-day average, as specified in section C.5.d)(6).

All testing must follow the requirements of OAC rule 3745-21-10(A).

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the



submission of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

- (3) The permittee shall conduct, or have conducted, an annual catalyst activity test using the catalyst sample(s) collected during the annual preventive maintenance inspection described in section A.III.8. An intent to test notification shall not be required for the testing noted in this section. The procedure for the catalyst activity test shall be in accordance with the document titled "Catalyst Activity Procedures" as submitted to the Ohio EPA on February 18, 1999.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

g) Miscellaneous Requirements

- (1) None.



**6. K011, Coating Line N**

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

Coating Line N. Hot melt adhesive and solventless silicone coater. Release ovens rated at 4.0 MMBtu/hr.

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 3745-21-09(F)	2.9 lbs of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
b.	40 CFR Part 63, Subpart JJJJ	Organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month; or  Organic HAP emissions shall not exceed 20 percent of the mass coating solids applied for each month.
c.	40 CFR 63.1-15	Table 2 to Subpart JJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

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

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



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

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

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

- (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:

63.3370	Calculate HAP emissions
63.3410(a) and 63.3410(b)	Required overall records that should be maintained.

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that included an identification 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))

- (2) 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:

63.3400(c)	Semi-annual compliance report
63.3400(g)	Start-up shutdown, malfunction reports

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

f) Testing Requirements

- (1) Compliance with the emission limitation in section b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

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



Applicable Compliance Method:

Compliance shall be demonstrated based upon the records required pursuant to section d)(1).

U.S. EPA Method 24 shall be used to determine the VOC content for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative statements for Method 24.

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

g) Miscellaneous Requirements

(1) None.



**7. K015, Coating Line GS**

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

Coating Line GS. Narrow web hot melt pressure sensitive coater and slitter.

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) g)(1)

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) (PTI 16-02086)	0.002 pound of volatile organic compounds (VOC) per pound of coating solids applied  19.2 pounds of VOC per day from coatings  5.8 tons of VOC per year from coatings and cleanup materials
b.	OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	40 CFR Part 60, Subpart RR	The emission limitation specified by this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart JJJJ	Organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month; or  Organic HAP emissions shall not exceed 20 percent of the mass coating solids applied for each month.
e.	40 CFR 63.1-15	Table 2 to Subpart JJJJ of 40 CFR Part



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		63 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

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

- a. the name and identification of each coating employed;
- b. the VOC content of each coating, in pound(s) per gallon;
- c. the solids content of each coating, in pounds per gallon;
- d. the number of gallons of each coating employed;
- e. the total solids applied for each coating, in pounds;
- f. the VOC content of each coating, in pound(s) of VOC per pound of coating solids applied;
- g. the VOC emission rate from each coating employed, in pounds;
- h. the VOC emission rate from all coatings employed, in pounds;
- i. the name and identification of each cleanup material employed;
- j. the VOC content of each cleanup material, in pounds per gallon;
- k. the number of gallons of each cleanup material employed;
- l. the VOC emission rate from each cleanup material employed, in pounds;
- m. the VOC emission rate from all cleanup materials employed, in pounds;
- n. the total VOC emission rate from all coatings and cleanup materials, in pounds;
- o. the total number of days the emissions unit operated during the month; and
- p. the average daily VOC emission rate for all coatings employed, in pounds.

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



- (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:

63.3370	Calculate HAP emissions
63.3410(a) and 63.3410(b)	Required overall records that should be maintained.

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

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 (a) the use of noncomplying coatings (i.e., VOC coating content) and/or (b) that the average daily VOC emission limitation was exceeded. 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 OAC rule 3745-31-05)

- (2) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

- (3) 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:

63.3400(c)	Semi-annual compliance report
63.3400(g)	Start-up shutdown, malfunction reports

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

f) Testing Requirements

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

a. Emission Limitation

0.002 pound of VOC per pound of coating solids applied

Applicable Compliance Method

Compliance with this emission limitation shall be demonstrated through the records required pursuant to Section C.7.d)(1).



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

b. Emission Limitation

19.2 pounds of VOC per day from coatings

Applicable Compliance Method

Compliance with this emission limitation shall be demonstrated through the records required pursuant to Section C.7.d)(1).

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

c. Emission Limitation

5.8 tons of VOC per year from coatings and cleanup materials

Applicable Compliance Method

Compliance with this emission limitation shall be demonstrated through the records required pursuant to Section C.7.d)(1).

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

- (2) Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings. Formulation data shall be used to determine the VOC contents of the cleanup materials.

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

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute<sup>e</sup>, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit=s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[ORC 3704.03(F)(3)(c) and F(4)]