State of Ohio Environmental Protection Agency

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

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

9/3/2009

Certified Mail

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

John Fielding
KAPCO
1000 CHERRY ST
KENT, OH 44240

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1667040151
Permit Number: P0105211
Permit Type: OAC Chapter 3745-31 Modification
County: Portage

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Record Courier. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control 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 draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
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 issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael W. Ahern

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

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

Portage County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
KAPCO

Issue Date: 9/3/2009
Permit Number: P0105211
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Chapter 31 modification for emissions units K001, K002, and K003 to increase the VOC emissions limitations. Also, limiting the potential to emit for any individual hazardous air pollutant (HAP), combined HAPs, and volatile organic compound emissions to avoid Title V and MACT applicability.
Facility ID: 1667040151
Facility Location: KAPCO
1000 CHERRY ST,
Kent, OH 44240
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, federally enforceable permit-to-install and operate (PTIO) 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 Laura Miracle at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Permit Strategy Write-Up

1. Check all that apply:

   X Synthetic Minor Determination

   ___ Netting Determination

2. Source Description: KAPCO is a custom coater and converter of flexible pressure-sensitive materials. The facility consists of three web coating lines (K001, K002, and K003).

3. Facility Emissions and Attainment Status: The facility has a potential to emit for an individual hazardous air pollutant (HAP) and volatile organic compounds (VOC) of 20.85 tons per year and 121.76 tons per year, respectively. These potentials to emit are above the Title V thresholds and major source threshold for nonattainment New Source Review (NSR).

4. Source Emissions: The facility has requested to limit the potential to emit to below the Title V thresholds for any individual HAP, combined HAPs, and VOC emissions. By limiting the potential to emit for any individual HAP, combined HAPs, and VOC, the facility will avoid MACT applicability under 40 CFR Part 63, Subpart JJJJ, Title V applicability, and major nonattainment NSR.

5. Conclusion: The facility maintain records of the coating usage, VOC content, individual HAP content for emissions units K001, K002, and K003, combined to show that the actual emissions are below the threshold levels.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	60.0 tons per year as a rolling, 12-month summation of the monthly emissions for emissions units K001, K002, and K003, combined

Any individual HAP	9.9 tons per year as a rolling, 12-month summation of the monthly emissions for emissions units K001, K002, and K003 combined
Combined HAPs	20.0 tons per year as a rolling, 12-month summation of the monthly emissions for emissions units K001, K002, and K003 combined

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
KAPCO

Facility ID:	1667040151
Permit Number:	P0105211
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	9/3/2009
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
KAPCO

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Authorization

Facility ID: 1667040151
Application Number(s): A0037949
Permit Number: P0105211
Permit Description: Chapter 31 modification for emissions units K001, K002, and K003 to increase the VOC emissions limitations. Also, limiting the potential to emit for any individual hazardous air pollutant (HAP), combined HAPs, and volatile organic compound emissions to avoid Title V and MACT applicability.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $600.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 9/3/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

KAPCO
1000 CHERRY ST
Kent, OH 44240

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

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

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 this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0105211
Permit Description: Chapter 31 modification for emissions units K001, K002, and K003 to increase the VOC emissions limitations. Also, limiting the potential to emit for any individual hazardous air pollutant (HAP), combined HAPs, and volatile organic compound emissions to avoid Title V and MACT applicability.

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

Group Name: **Coating Lines**

Emissions Unit ID:	**K001**
Company Equipment ID:	60" Coating Line
Superseded Permit Number:	16-02041
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	30" Coating Line
Superseded Permit Number:	16-02041
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	80" Coating Line
Superseded Permit Number:	16-02434
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. **What does this permit-to-install and operate ("PTIO") allow me to do?**

   This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. **Who is responsible for complying with this permit?**

   The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

   The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. **What records must I keep under this permit?**

   You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. **What are my permit fees and when do I pay them?**

   There are two fees associated with permitted air contaminant sources in Ohio:

   - PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

     You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

   - Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. **When does my PTIO expire, and when do I need to submit my renewal application?**

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) 1.c), 1.d), 1.e), 1.f), and 1.g).

   c) The emissions of any individual hazardous air pollutant (HAP), combined HAPs, and volatile organic compounds (VOC) from emissions units K001, K002, and K003, combined, shall not exceed 9.9 tons per year, 20.0 tons per year, and 60.0 tons per year, respectively, based upon the rolling, 12-month summations of the monthly emission rates. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of any individual HAP	Maximum Allowable Cumulative Emissions of combined HAPs	Maximum Allowable Cumulative Emissions of VOC
1	0.8 ton	1.7 tons	5.0 tons
1-2	1.7 tons	3.3 tons	10.0 tons
1-3	2.5 tons	5.0 tons	15.0 tons
1-4	3.3 tons	6.7 tons	20.0 tons
1-5	4.1 tons	8.3 tons	25.0 tons
1-6	5.0 tons	10.0 tons	30.0 tons
1-7	5.8 tons	11.7 tons	35.0 tons
1-8	6.6 tons	13.3 tons	40.0 tons
1-9	7.4 tons	15.0 tons	45.0 tons
1-10	8.3 tons	16.7 tons	50.0 tons
1-11	9.1 tons	18.3 tons	55.0 tons
1-12	9.9 tons	20.0 tons	60.0 tons

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitations for any individual HAP,

combined HAPs, and VOC shall be based upon the rolling, 12-month summations of the monthly emissions.

d) In order to demonstrate compliance with the emission limitations in 1.c) above, the permittee shall collect and record the following information each month for emissions units K001, K002, and K003, combined:

(1) the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP and/or VOC;

(2) the VOC content of each VOC containing material applied (and identified in d)(1) above) in pound(s) of VOC per gallon of each VOC containing material applied or weight fraction of VOC contained in each material applied;

(3) the name/identification of each individual HAP contained in each material applied (and identified in d)(1) above and the pound(s) of each HAP per gallon of each HAP-containing material applied or the weight fraction of each individual HAP contained in each material applied;

(4) the number of gallons or pounds of each coating, thinner, additive, cleanup material, and other material applied during the month;

(5) the VOC emissions from all the materials employed, in ton(s), i.e., the summation of the products of d)(2) times d)(4) above for all materials applied during the month, divided by 2,000 pounds per ton;

(6) for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(3) times d)(4) above for all the materials applied during the month, divided by 2,000 pounds per ton;

(7) the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(6) above;

(8) beginning after the first 12 calendar months following the issuance of this permit , the VOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in d)(5) above, for the present month plus the previous 11 months of operation, in ton(s);

(9) beginning after the first 12 calendar months following the issuance of this permit , for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(6) above, for the present month plus the previous 11 months of operation, in ton(s); and

(10) beginning after the first 12 calendar months following the issuance of this permit , for combined HAPs, the total emissions during the rolling, 12-month period, i.e., the summation of the combined HAPs emissions, as recorded in d)(7) above, for the present month plus the previous 11 months of operation, in ton(s)

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC, combined HAPs, and each individual HAP emissions for each calendar month

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

e) The permittee shall submit quarterly deviation (excursion) reports that identify:

(1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

a. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month emission limitation for VOC, for emissions units K001, K002, and K003, combined;

b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedance of the rolling, 12-month emission limitation for any individual HAP, for emissions units K001, K002, and K003, combined;

c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedance of the rolling, 12-month emission limitation for combined HAPs, for emissions units K001, K002, and K003, combined; and

d. for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for any individual HAP, combined HAPs and VOC, for emissions units K001, K002, and K003, combined.

(2) the probable cause of each deviation (excursion);

(3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

(4) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the

Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

g) Compliance with the emissions limitation(s) in 1.c) above shall be determined in accordance with the following method(s):

(1) Emissions Limitations:

The emissions of any individual HAP, combined HAPs, and VOC from emissions units K001, K002, and K003, combined, shall not exceed 9.9 tons per year, 20.0 tons per year, and 60.0 tons per year, respectively, based upon the rolling, 12-month summations of the monthly emission rates.

Applicable Compliance Method:

Compliance with the annual allowable VOC, combined HAPs, and individual HAP emission limitations above shall be demonstrated based on the record keeping requirements established in 1.d) above.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Coating Lines: K001, K002, K003,

EU ID	Operations, Property and/or Equipment Description
K001	60 inch reverse roll coating head and two natural gas fired ovens - paper coating line.
K002	30 inch reverse roll coating head and two infrared ovens - paper coating line.
K003	80 inch reverse roll coating head and two natural gas fired ovens - 80 inch coating line.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)h., d)(5), d)(6), d)(7), d)(8) and e)(2).

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)	The volatile organic compound (VOC) emissions from emissions unit K001 shall not exceed 141.7 pounds per hour for coatings. The VOC emissions from emissions unit K002 shall not exceed 72.0 pounds per hour for coatings. The VOC emissions from emissions unit K003 shall not exceed 188.9 pounds per hour for coatings.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), nitrogen oxides (NO_x), carbon monoxide (CO), and sulfur dioxide (SO_2) emissions from the natural gas combustion emissions from emissions

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		units K001 and K003 since the uncontrolled potential to emit for PE, NO_x, CO, and SO_2 are each less than 10 tons/year.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Major Nonattainment New Source Review and to avoid MACT applicability under 40 CFR Part 63, Subpart JJJJ)	See 1.c) of Section B – Facility-Wide Terms and Conditions.
d.	OAC rule 3745-17-07	For emissions units K001 and K003 for the oven exhaust stacks: Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
e.	OAC rule 3745-17-10	For emissions units K001 and K003 for the ovens: 0.020 pound of PE per million Btu of actual heat input
f.	OAC rule 3745-21-09(F)	2.9 pounds VOC per gallon of coating, excluding water and exempt solvents
g.	40 CFR Part 60, Subpart RR	Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a) of 40 CFR Part 60, subpart RR, however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to section 60.442(a) and all other sections of 40 CFR Part 60, subpart RR.
h.	OAC rule 3745-114-01	See d)(5) through d)(8) below.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limits were established to reflect the potentials to emit for the emissions units listed above. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitations.

The permittee shall submit a new application and be issued a new permit if a new process material is to be used that would cause the emissions units listed above to exceed the permitted potential to emit established in this permit

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line:

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

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific “gallons/year” and/or “tons/year” limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(2) The owner or operator of an affected facility subject to 40 CFR Part 60, subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section 40.446(a) of 40 CFR Part 60, subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

(3) The owner or operator of an affected facility operating at the conditions specified in section 60.440(b) of 40 CFR Part 60, subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

(4) Records of the measurements required in d)(2) and d)(3) above must be retained for at least two years following the date of the measurements.

(5) The federally enforceable permit-to-install and operate (FEPTIO) application for these emissions unit(s), K001, K002, and K003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: vinyl acetate

TLV (mg/m3): 35

Maximum Hourly Emission Rate (lbs/hr): 4.13*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 541

MAGLC (ug/m3): 833

Combined emission rate increase for K001, K002, and K003.

The permittee, has demonstrated that emissions of vinyl acetate, from emissions unit(s) K001, K002, and K003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitation in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be demonstrated through the record keeping requirements established in d)(1) above. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

b. Emission Limitations:

The VOC emissions from emissions unit K001 shall not exceed 141.7 pounds per hour for coatings.

The VOC emissions from emissions unit K002 shall not exceed 72.0 pounds per hour for coatings.

The VOC emissions from emissions unit K003 shall not exceed 188.9 pounds per hour for coatings.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be demonstrated by multiplying the worst-case VOC-containing coating, as applied, in pound(s) of VOC per gallon of coating by the maximum hourly application rate (in gallons per hour).

c. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be demonstrated through the record keeping requirements established in d)(2) and d)(3) above.

d. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions unit shall be determined in accordance with the test method(s) and procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

0.020 pound of PE per million Btu of actual heat input

Applicable Compliance Method:

If required, compliance with the particulate emission limitation shall be determined in accordance with the test method(s) and procedures specified in OAC rule 3745-17-03(B)(9).

g) Miscellaneous Requirements

(1) None.