

Facility ID: 0243081207 Issuance type: Title V Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. 40 CFR Part 63, Subpart JJJJ MACT Requirements

These emissions units (K001, K002 and K003) because of the potential to emit of HAPS from these coating lines are subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart JJJJ, in accordance with 40 CFR Parts 63.3280 through 63.3410 (including the Table(s) and Appendix(ices) referenced in Subpart JJJJ), which are included in the text of Attachment 1 hereto, and are hereby incorporated into this permit as if fully rewritten.

2. 40 CFR Part 63, Subpart KK MACT Requirements

Emissions unit (K001) because of the potential to emit of HAPS from the coating lines located at this facility and the printing capability of this line is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart KK, in accordance with 40 CFR Parts 63.820 through 63.830 (including the Table(s) and Appendix(ices) referenced in Subpart KK), which are included in the text of Attachment 2 hereto, and are hereby incorporated into this permit as if fully rewritten.

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b State Only Enforceable Section

1. 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:

Z001 - adhesive tank;
Z002 - adhesive tank;
Z003 - adhesive tank;
Z004 - adhesive tank;
Z005 - adhesive tank;
Z006 - adhesive tank;
Z007 - adhesive tank;
Z008 - waste-water treatment tank;
Z009 - waste-water treatment tank;
Z010 - 4.158 mmBtu/hour plant air heating unit (Heater 1);
Z011 - 4.455 mmBtu/hour plant air heating unit (Heater 2);
Z012 - 4.72 mmBtu/hour plant air heating unit (Heater 3); and
Z013 - 4.0 mmBtu/hour plant air heating unit (Heater 4).

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243081207 Emissions Unit ID: K001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paper and film coating line, CF - 1	OAC rule 3745-31-05(A)(3) (PTI 02-03703)	Volatile organic compounds (VOC) emissions from coatings and cleanup materials employed in this emissions unit shall not exceed 99 tons per year.
	OAC rule 3745-21-09(F)	See section A.II.1 of these terms and conditions. The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC in excess of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.
	40 CFR Part 60, Subpart RR	The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.
	40 CFR Part 63, Subpart KK	Exempt
	40 CFR Part 63, Subpart JJJJ	See Part II, section A.2 and sections A.I.2.a, A.I.2.b and A.III.1 below. The permittee shall not discharge organic HAP emissions into the atmosphere of more than 4 percent of the mass of coating applied or more than 20 percent of the mass of coating solids applied calculated for each month.

See Part II, section A.1.

2. Additional Terms and Conditions

- a. The permittee has chosen to exclude this emissions unit, which is used primarily for coating, laminating, or other operations, from the 40 CFR Part 63, Subpart KK, Printing and Publishing MACT requirements.
- b. The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the printing process using product and packaging rotogravure work stations in each month shall never exceed five (5) weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by this emissions unit in that month, including all inboard and outboard stations.

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II. Operational Restrictions

1. For each calendar year of operation, this emissions unit shall be operated so as not to exceed the following maximum year-to-date emission limitations at the end of each month:

Month Maximum Year-to-Date VOC Emissions (in tons)

January 13
 February 25
 March 36
 April 46
 May 55
 June 63
 July 70
 August 76
 September 82
 October 88
 November 92
 December 99

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-03703]

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain the following information for five (5) years and submit it to the Administrator of US EPA and/or the Director (Ohio EPA Northeast District Office) upon request:
 - a. the total mass of each material applied each month in this emissions unit, including all inboard and outboard stations;
 - b. the total mass of all materials applied each month in this emissions unit, including all inboard and outboard stations;
 - c. the total mass of each material applied each month in this emissions unit by product and packaging rotogravure printing work stations; and
 - d. the total mass of all materials applied each month on this emissions unit by product and packaging rotogravure printing work stations.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-03703]

2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied;
 - c. the VOC content of each coating (including water and exempt solvents) and cleanup material, in pounds per gallon, as applied;
 - d. the amount of each coating and cleanup material employed, in gallons; and
 - e. the total VOC emissions from all coatings and cleanup materials, in tons.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. Each month, the permittee shall sum the monthly VOC emission rates for the calendar year, and shall maintain a year-to date record of the total VOC emissions from all coatings and cleanup materials for this emissions unit, in tons per year.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall maintain a calendar month record of the following information:
 - a. the name and identification number for each of the coatings used;
 - b. the weighted average of the mass of solvent used per mass of coating solids applied, in kg VOC/kg of coating solids, calculated in accordance with the following:
 - i. the weight fraction of organics and the weight fraction of solids of each coating applied shall be determined by using Reference Method 24 or other test method approved by U.S.EPA, or by the coating manufacturer's formulation data;
 - ii. the weighted average shall be calculated by using the following equation:

$$G = (TWMo) / (TWMs)$$

where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month;

TWMO = the sum, from $i = 1$ to $i = n$, of $(Woi \times Mci)$;

TWMS = the sum, from $i = 1$ to $i = n$, of $(Wsi \times Mci)$;

i = subscript denoting an individual coating;

n = the number of different coatings;

M_{ci} = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records;

W_{oi} = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data; and

W_{si} = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-03703]

5. The permittee shall collect, record and determine where appropriate the following information each month for this emissions unit:

a. the name and identification number of each coating employed;

b. the average of the mass of HAP emissions per mass of coating solids applied, in kg HAP/kg coating solids applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP(s) and the weight fraction of coating solids of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311 or 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S.EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 5 in section 63.3370(c)(4) of the attached MACT standard, 40 CFR Part 63, Subpart JJJJ with the following variables:
where:

H_s = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied;

p = Number of different coating materials applied in a month;

Ch_i = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg;

M_i = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Ch_{ij} = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg;

Mv_{ret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.);

Cs_i = Coating solids content of coating material, i, expressed as a mass fraction, kg/kg; and

Cs_{ij} = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass-fraction, kg/kg;

c. the average of the mass of HAP emissions per mass of coating applied, in kg HAP/kg coating applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP and the weight fraction coating of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311, 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S.EPA;

ii. the average shall be calculated using equation 4 of Section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ:

where:

HL = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg;

p = Number of different coating materials applied in a month;

Ch_i = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg;

M_i = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Ch_{ij} = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg; and

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.).

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install No. 02-3703, issued on February 28, 1990: section A.IV.2 in this Title V permit. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation (excursion) report that include the following information for this emissions unit:
 - a. an identification of each month during which any noncomplying coatings (VOC content exceeded 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents) were employed, and the actual coating content, in pounds of VOC per gallon of coating, excluding water and exempt solvent for each such coating;
 - b. an identification of each month during which the year-to-date VOC emissions from the coatings and cleanup materials exceeded the limitations in section A.II.1 of these terms and conditions, and the actual VOC emissions for each such month;
 - c. an identification of each month during which the mass-weighted average VOC emissions exceeded 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions, in kg VOC/kg of coating solids, for each such month;
 - d. an identification of each month during which the five (5) weight-percent limitation specified in A.I.2.b was exceeded, and the actual weight-percent for the month; and
 - e. an identification of each month during which the average HAP emissions from coatings exceed 20% of the mass of coating solids applied as described in equation 5 for Hs in section 63.3370(c)(4) of the attached MACT standard, 40 CFR Part 63, Subpart JJJJ and 4% of the mass of coatings, applied as described in section A.III.5.c.ii using equation 4 of HL of section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

3. All deviation (excursion) reports shall be submitted in accordance with section A.1 of the General Terms and Conditions.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall also submit annual reports of the VOC emissions from this emissions unit. These reports shall include the calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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V. Testing Requirements

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

- a. Emission Limitation:

The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC in excess of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. of these terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of the coatings, or other EPA test method, including SW-846 and 8260 A, or any alternative compliance method including formulation data, manufacturer's specifications, alternative equivalent test methods, if approved by USEPA.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg of VOC/kg of

coating solids applied, calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.4 of these terms and conditions.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

VOC emissions from coatings and cleanup materials employed in this emissions unit shall not exceed 99 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 of these terms and conditions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-03703]

d. Emission Limitation:

The permittee shall not discharge into the atmosphere emissions of more than 20 percent of the mass of HAPs to mass of coating solids applied (0.20 kg HAPs/kg coating solids), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5 of these terms and conditions.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

The permittee shall not discharge into the atmosphere emissions of more than 4% of the mass of HAPs to the mass of coating, applied (0.04 kg HAPs/kg of coating), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5 of these terms and conditions.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. USEPA Method 24 or GCMS, Capillary Column Technique Method 8260A shall be used to determine the VOC contents of the cleanup materials employed in this emissions unit, unless otherwise approved by Ohio EPA.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0243081207 Emissions Unit ID: K001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

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V. **Testing Requirements**

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243081207 Emissions Unit ID: K002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Paper and film coating line with ovens and corona treaters, CF - 2	OAC rule 3745-31-05(A)(3) (PTI 02-15512)	Volatile organic compounds (VOC) emissions shall not exceed 21.0 pounds per hour from coatings and cleanup materials.
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Nitrogen oxides (NOx) emissions shall not exceed 1.5 pounds per hour.

Ozone emissions shall not exceed 0.62 pound per hour.

See sections A.I.2.a and A.II.1 of these terms and conditions.

OAC rule 3745-21-09(F)

The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

40 CFR Part 60, Subpart RR

The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.

40 CFR Part 63, Subpart JJJJ

The permittee shall not discharge organic HAP emissions into the atmosphere of more than 4 percent of the mass of coating applied or more than 20 percent of the mass of coating solids applied calculated for each month.

See Part II, section A.1.

2. Additional Terms and Conditions

- a. The permittee shall only employ emulsions (water based coatings) with a maximum VOC content of 0.0623 pound per gallon of coating in this emissions unit.

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II. Operational Restrictions

- 1. The permittee shall use low NOx burners at all times when this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15512]

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating and cleanup material in pounds per gallon, as applied;
 - c. the amount of each coating and cleanup material employed, in gallons per day;
 - d. the total VOC emissions from all coatings and cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-15512]

- 2. The permittee shall maintain a calendar month record of the following information:
 - a. the name and identification number for each of the coatings used;
 - b. the weighted average of the mass of solvent used per mass of coating solids applied, in kg VOC/kg of coating solid, calculated in accordance with the following:
 - i. the weight fraction of organics and the weight fraction of solids of each coating applied shall be determined by using Reference Method 24 or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data;
 - ii. the weighted average shall be calculated by using the following equation:

$$G = (TWMo) / (TWMs)$$

where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month;

TWMo = the sum, from i = 1 to i = n, of (Woi x Mci);

TWMs = the sum, from i = 1 to i = n, of (Wsi x Mci);

i = subscript denoting an individual coating;

n = the number of different coatings;

Mci = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records;

Woi = the weight fraction of organics applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data; and

Wsi = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-15512]

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

a. the name and identification number of each coating employed;

b. the average of the mass of HAP emissions per mass of coating solids applied, in kg HAP/kg coating solids applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP(s) and the weight fraction of coating solids of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311 or 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S.EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 5 in section 63.3370(c)(4) of the attached MACT standard, 40 CFR Part 63, Subpart JJJJ with the following variables:
where:

Hs = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied;

p = Number of different coating materials applied in a month;

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg;

Mi = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg;

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.);

Csi = Coating solids content of coating material, i, expressed as a mass fraction, kg/kg; and

Csij = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass-fraction, kg/kg;

c. the average of the mass of HAP emissions per mass of coating applied, in kg HAP/kg coating applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP and the weight fraction coating of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311, 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S.EPA;

ii. the average shall be calculated using equation 4 of Section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ:

where:

HL = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg;

p = Number of different coating materials applied in a month;

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg;

Mi = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg; and

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.)

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) report that include the following information for this emissions unit:
 - a. an identification of each month during which any noncomplying coatings (VOC content exceeded 0.0623 pound of VOC per gallon of coating) were employed, and the actual coating content, in pounds of VOC per gallon of coating for each such coating;
 - b. an identification of each day during which the average hourly VOC emissions from this emissions unit exceeded 21.0 pounds per hour, and the actual average hourly VOC emissions from this emissions unit for each such day;
 - c. an identification of each month during which the mass-weighted average VOC emissions exceeded 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions, in kg VOC/kg of coating solids, for each such month; and
 - d. an identification of each month during which the average HAP emissions from coatings exceed 20% of the mass of coating solids applied as described in equation 5 for Hs in section 63.3370(c)(4) of the attached MACT standard, 40 CFR Part 63, Subpart JJJJ and 4% of the mass of coatings, applied as described in section A.III.3.c.ii using equation 4 of HL of section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-15512]

2. All deviation (excursion) reports shall be submitted in accordance with section A.1 of the General Terms and Conditions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-15512]

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V. Testing Requirements

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

VOC emissions shall not exceed 21.0 pounds per hour from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions.
 - b. Emission Limitation:

NOx emissions shall not exceed 1.5 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor of 100 pounds of NOx per million cubic foot of natural gas input, from AP - 42, July 1998, section 1.4, Natural Gas Combustion, by the maximum hourly gas burning capacity (11,373 cubic foot) of this emissions unit.
 - c. Emission Limitation:

Ozone emissions shall not exceed 0.62 pound per hour.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the emission factor of 0.0138 pound of ozone per hour per kW by 15 kW per corona treater, and by 3 corona treaters. The emission factor was determined by the manufacturer's internal stack tests.
 - d. Emission Limitation:

The permittee shall not cause the discharge into the atmosphere of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 of these terms and conditions.

e. Emission Limitation

The permittee shall only employ emulsions (water based coatings) with a maximum VOC content of 0.0623 pound per gallon of coating in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of the coatings or other EPA test method, including SW-846, or any alternative compliance method including formulation data, manufacturer's specifications, or alternative equivalent test methods, if approved by USEPA. In accordance with the USEPA's written approval of February 11, 1998, GCMS, Capillary Column Technique Method 8260A may be used to determine the VOC content of the water-based coatings, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A.

f. Emission Limitation:

The permittee shall not discharge into the atmosphere emissions of more than 20 percent of the mass of HAPs to mass of coating solids applied (0.20 kg HAPs/kg coating solids), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 of these terms and conditions.

g. Emission Limitation:

The permittee shall not discharge into the atmosphere emissions of more than 4% of the mass of HAPs to the mass of coating, applied (0.04 kg HAPs/kg of coating), calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 of these terms and conditions.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

2. USEPA Method 24 or GCMS, Capillary Column Technique Method 8260A shall be used to determine the VOC contents of the cleanup materials employed in this emissions unit, unless otherwise approved by Ohio EPA.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-15512]

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243081207 Emissions Unit ID: K002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243081207 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

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.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Coating Line CF-3 - paper, film, and other web substrate roll coating line with drying oven, wind and unwind station, and web treatment to coat 100% solid silicones and emulsion topcoats	OAC rule 3745-31-05(A)(3) (PTI 02-18178)	Volatile organic compounds (VOC) emissions from the coating line shall not exceed 27.6 pounds per hour as a daily average, including cleanup, and 121 tons per year.

Nitrogen oxides (NOx) emissions from the ovens and web treater shall not exceed 1.40 pounds per hour and 6.2 tons per year. See section A.II.1 below.

Carbon monoxide (CO) emissions from the ovens and web treater shall not exceed 1.20 pounds per hour and 5.2 tons per year. See sections A.I.2.a and A.I.2.b below.

OAC rule 3745-21-09(F)

The VOC content limitation specified by this applicable rule is less stringent than the VOC content limitation established pursuant to 40 CFR Part 60, Subpart RR.

40 CFR Part 60, Subpart RR

The permittee shall not discharge VOC emissions into the atmosphere of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each month.

40 CFR Part 63, Subpart JJJJ

The permittee shall not discharge organic HAP emissions into the atmosphere of more than 4 percent of the mass of coating applied or more than 20 percent of the mass of coating solids applied calculated for each month.

See Part II, section A.1 and section A.VI.1 below.

2. Additional Terms and Conditions

- a. Only coatings with a maximum VOC content of 0.54 pound per gallon of coating shall be used in this emissions unit.
- b. Silicone and top coat coatings shall not be applied concurrently.

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II. Operational Restrictions

- 1. The permittee shall use low NOx burners in the ovens at all times when this emissions unit is in operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-18178]

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each coating and cleanup material in pounds per gallon, as applied;
 - c. the amount of each coating and cleanup material employed, in gallons per day;
 - d. the total VOC emissions from all coatings and cleanup materials, in pounds and tons per day;
 - e. the total annual VOC emissions from all coatings and cleanup materials to date, in tons;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the daily average hourly VOC emission rate from all coatings and cleanup materials employed, i.e., (d)/(e), in pounds per hour (daily average).

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-18178]

- 2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the weighted average of the mass of solvent (VOC) used per mass of coating solids applied, in kg VOC/kg coating solids applied, calculated in accordance with the equation in section 60.443(a)(2) of 40 CFR Part 60, Subpart RR, and as follows:
 - i. the weight fraction of VOC and the weight fraction coating solids of each coating applied shall be determined by 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;
 - ii. the weighted average shall be calculated using the following equation:

$$G = (TWMO) / (TWMS)$$

where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each

calendar month;

TWMO = the sum, from $i = 1$ to $i = n$, of $(Woi \times Mci)$;

TWMS = the sum, from $i = 1$ to $i = n$, of $(Wsi \times Mci)$;

i = subscript denoting an individual coating;

n = the number of different coatings employed;

Mci = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records;

Woi = the weight fraction of volatile organic compounds of each coating (i) applied during the calendar month as determined by Reference Method 24 or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data; and

Wsi = the weight fraction of coating solids of each coating (i) applied during the calendar month as determined by Reference Method 24, or any other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-18178]

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

a. the name and identification number of each coating employed;

b. the average of the mass of HAP emissions per mass of coating solids applied, in kg HAP/kg coating solids applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP(s) and the weight fraction of coating solids of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311 or 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 5 in Section 63.3370(c)(4) of the attached MACT standard, 40 CFR Part 63, Subpart JJJJ with the following variables:

where:

H_s = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied;

p = Number of different coating materials applied in a month;

Chi = Organic HAP content of coating material, i , as-purchased, expressed as a mass fraction, kg/kg;

Mi = Mass of as-purchased coating material, i , applied in a month, kg;

q = Number of different materials added to the coating material;

$Chij$ = Organic HAP content of material, j , added to as-purchased coating material, i , expressed as a mass fraction, kg/kg;

Mij = Mass of material, j , added to as-purchased coating material, i , in a month, kg;

$Mvret$ = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.);

Csi = Coating solids content of coating material, i , expressed as a mass fraction, kg/kg; and

$Csij$ = Coating solids content of material, j , added to as-purchased coating material, i , expressed as a mass fraction, kg/kg;

c. the average of the mass of HAP emissions per mass of coating applied, in kg HAP/kg coating applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR Part 63, Subpart JJJJ, and as follows:

i. the weight fraction of HAP and the weight fraction coating of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311, 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA;

ii. the average shall be calculated using equation 4 of Section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ:

where:

HL = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg;

p = Number of different coating materials applied in a month;

Chi = Organic HAP content of coating material, i , as-purchased, expressed as a mass fraction, kg/kg;

Mi = Mass of as-purchased coating material, i, applied in a month, kg;

q = Number of different materials added to the coating material;

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg;

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg; and

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg (The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 63.3370.).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-18178]

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following information for this emissions unit:
 - a. an identification of each day during which any noncomplying coatings where the VOC content exceeded 0.54 pound of VOC per gallon of coating were employed, and the actual VOC content in pounds of VOC per gallon of coating, for each such coating;
 - b. an identification of each day during which the average hourly VOC emissions exceeded 27.6 pounds per hour, and the actual average hourly VOC emissions, for each such day;
 - c. an identification of any record indicating that the annual VOC emissions exceeded 121 tons per year, and the actual annual VOC emissions;
 - d. an identification of each month during which the mass-weighted average VOC emissions from coatings exceeded 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions from coatings in kg VOC/kg of coating solids applied, for each such month; and
 - e. an identification of each month during which the average HAP emissions from coatings exceed 20% of the mass of coating solids applied as described in equation 5 for Hs in section 63.3370(c)(4) of the attached MACT standard, 40 CFR Part 63, Subpart JJJJ and 4% of the mass of coatings, applied as described in section A.III.3.c.ii using equation 4 of HL of section 63.3370(c)(3) of 40 CFR Part 63, Subpart JJJJ.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-18178]

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V. Testing Requirements

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

Only coatings with a maximum VOC content of 0.54 pound per gallon of coating shall be used in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC content of the coatings, or other EPA test method, including SW-846 and 8260 A, or any alternative compliance method including formulation data, manufacturer's specifications, alternative equivalent test methods, if approved by USEPA.
 - b. Emission Limitation:

VOC emissions from the coating line shall not exceed 27.6 pounds per hour as a daily average, including cleanup, and 121 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions.

The tpy emission limitation was developed by multiplying the short-term allowable VOC emission limitation (27.6 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

- c. Emission Limitation:
- The permittee shall not discharge VOC emissions into the atmosphere emissions of more than 0.20 kg of VOC/kg of coating solids applied, calculated as a mass-weighted average for each calendar month.
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2 of these terms and conditions.
- d. Emission Limitation:
- The permittee shall not discharge organic HAP emissions into the atmosphere emissions of more than 20 percent of the mass of HAPs to mass of coating solids applied (0.20 kg HAPs/kg coating solids), calculated as a mass-weighted average for each calendar month.
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 of these terms and conditions.
- e. Emission Limitation:
- The permittee shall not discharge into the atmosphere emissions of more than 4% of the mass of HAPs to the mass of coating, applied (0.04 kg HAPs/kg of coating), calculated as a mass-weighted average for each calendar month.
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 of these terms and conditions.
- f. Emission Limitation:
- NOx emissions from the ovens and web treater shall not exceed 1.40 pounds per hour and 6.2 tons per year.
- Applicable Compliance Method:
- Compliance shall be determined by multiplying the emission factor of 100 pounds of NOx per million cubic feet of natural gas (EPA AP-42, July 1998, Section 1.4, Natural Gas Combustion) by the maximum hourly natural gas combustion capacity (14,000 ft³/hr) of this emissions unit. If required, emission testing to determine compliance with the above emission limitation shall be performed, using Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A.
- The tpy emission limitation was developed by multiplying the short-term allowable NOx emission limitation (1.40 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.
- g. Emission Limitation:
- CO emissions from the ovens and web treater shall not exceed 1.20 pounds per hour and 5.2 tons per year.
- Applicable Compliance Method:
- Compliance shall be determined by multiplying the emission factor of 84 pounds of CO per million cubic feet of natural gas (EPA AP-42, July 1998, Section 1.4, Natural Gas Combustion) by the maximum hourly natural gas combustion capacity (14,000 ft³/hr) of this emissions unit. If required, emission testing to determine compliance with the above emission limitation shall be performed, using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A.
- The tpy emission limitation was developed by multiplying the short-term allowable CO emission limitation (1.20 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.
- [Authority for Term: OAC rule 3745-77-07(C)(1)]
2. USEPA Method 24 or GCMS, Capillary Column Technique Method 8260A shall be used to determine the VOC contents of the coating and cleanup materials employed in this emissions unit, unless otherwise approved by Ohio EPA.
- [Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-18178]

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VI. **Miscellaneous Requirements**

1. The MACT requirement of this Title V permit concerning the discharge of organic HAP emissions in section A.I.1 related to Applicable Rules/Requirement 40 CFR Part 63, Subpart JJJJ of this permit supercedes the MACT requirement listed in Permit to Install number 02-18178 in section A.I.1 under the same Applicable Rule/Requirement.

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Facility ID: 0243081207 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

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.

I. Applicable Emissions Limitations and/or Control Requirements

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None