



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

10/24/01

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

08-57-09-0718
Monarch Marking Systems, Inc.
Lloyd Goff Sr.
170 Monarch Lane
Miamisburg, OH 45342

Dear Lloyd Goff:

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact RAPCA.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: RAPCA
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 10/24/01	Effective Date: 10/24/01	Expiration Date: 10/24/06
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This document constitutes issuance of a Title V permit for Facility ID: 08-57-09-0718 to:
 Monarch Marking Systems, Inc.
 170 Monarch Lane
 Miamisburg, OH 45342

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (B001) 7.2 MMBTU gas/oil boiler	K051 (K051) Adhesive coater/laminator #227	L001 (L001) Ultra sonic cleaner
B002 (B002) 7.2 MMBTU gas/oil boiler	K052 (K052) Adhesive coater/laminator #229	P016 (P016) Band wiping station
B003 (B003) 7.2 MMBTU gas/oil boiler	K053 (K053) Adhesive coater/laminator #246	P017 (P017) Band molding
B004 (B004) Emergency Generator	K054 (K054) 23 FLEXOGRAPHIC PRINTING PRESSES	P018 (P018) Mold break station
K005 (K005) Band spray booth	K055 (K055) Coater/Laminator #268	P019 (P019) Mold release spray
K050 (K050) Adhesive coater/laminator #247	K056 (K056) Coater/Laminator #269	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

RAPCA
 451 West Third Street
 PO Box 972
 Dayton, OH 45422
 (937) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but

excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

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

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

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

16. Off Permit Changes

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or

pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

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

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

B001	7.2 mmBtu/hour, natural gas and No. 2 oil-fired boiler
B002	7.2 mmBtu/hour, natural gas and No. 2 oil-fired boiler
B003	7.2 mmBtu/hour, natural gas and No. 2 oil-fired boiler
B004	Emergency generator
K028	No. 1 Itoh flexographic press
K029	No. 2 Itoh flexographic press
K054	Thirty-four flexographic printing presses
K102	13.5" Hot melt laminator
K103	20" Hot melt laminator
L006	Tool room cleaner
L007	Machine room cleaner
L010	902 Stoddard cleaner
P012	Schriber press #217
P013	Photochemical etch
P017	Band molding station
P018	Mold break station
P019	Mold release spray
P020	Milacron injection
P022	6 injection molds
P027	245-ton injection mold
P028	245-ton injection mold
P029	Merigraph plate making
R001	Devilbiss paint spray booth
T002	20,000-gallon No. 2 fuel oil underground storage tank
T003	30,000-gallon No. 2 fuel oil underground storage tank
T004	2,000-gallon No. 1 fuel oil underground storage tank
Z001	13 injection molds

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for this emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B001 (B001)
Activity Description: 7.2 MMBTU gas/oil boiler

A. State and Federally Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B002 (B002)
Activity Description: 7.2 MMBTU gas/oil boiler

A. State and Federally Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B003 (B003)
Activity Description: 7.2 MMBTU gas/oil boiler

A. State and Federally Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B004 (B004)
Activity Description: Emergency Generator

A. State and Federally Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: K005 (K005)
Activity Description: Band spray booth

A. State and Federally Enforceable Section

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>
Band spray booth	OAC rule 3745-31-05(A)(3) PTI 08-1922	5.18 lbs/hour and 36.26 lbs/day organic compounds (OC), excluding cleanup;
	OAC rule 3745-21-07(G)(2)	9.6 TPY OC, including cleanup The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 5.18 lbs/hour OC limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the band spray booth:
 - a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The OC content for each coating employed, in lbs/gallon, as applied.
 - d. The total OC emission rate for all the coatings employed [summation of (b x c) for all coatings], in lbs.
 - e. The total number of days the emissions unit was in operation.
 - f. The average daily OC emission rate for all the coatings employed, i.e., (d)/(e), in pounds per day (average).

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following additional information each month for the band spray booth:
 - a. The company identification for each cleanup material employed.
 - b. Whether or not each cleanup material is a photochemically reactive material.
 - c. The number of gallons of each cleanup material employed.
 - d. The OC content of each cleanup material employed, in lbs/gallon.
 - e. The total OC emission rate for all the cleanup materials employed [summation of (c x d) for all cleanup materials], in tons.
 - f. The total OC emission rate for all the coatings and cleanup materials employed [1.d + 2.e], in tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the average daily organic compound emissions from all the coatings exceeded 36.26 lbs, and the actual average daily organic compound emissions for each such month. These quarterly deviation reports shall be submitted in accordance with Section A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation reports that identify all periods of time during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the deviation occurs.
3. The permittee shall submit annual reports that specify the total actual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
5.18 lbs/hour OC, excluding cleanup

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly coatings usage rate (gallons/hour) by the maximum OC content of all the coatings employed (lbs/gallon).
 - 1.b Emission Limitation -
36.26 lbs/day OC, excluding cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
 - 1.c Emission Limitation -
9.6 TPY OC, including cleanup

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and A.III.2 of this permit and shall be the sum of the 12 monthly OC emission rates, for coatings and cleanup materials, for the calendar year.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: K050 (K050)
Activity Description: Adhesive coater/laminator #247

A. State and Federally Enforceable Section

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>
Adhesive coater/laminator #247	OAC rule 3745-31-05(A)(3) PTI 08-3372	4.77 lbs/hour volatile organic compounds (VOC)
		14.9 TPY VOC, as a rolling, 365-day summation
		0.046 lb VOC/gallon of adhesive coating, excluding water and exempt solvents
	40 CFR, Part 60, Subpart RR	0.010 kg VOC/kg adhesive coating solids
		0.86 lb VOC/gallon of silicone, excluding water and exempt solvents
		0.113 kg VOC/kg silicone solids
OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

- 2.a The 4.77 lbs/hour VOC limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The cleanup material employed in this emissions unit is water.

II. Operational Restrictions

1. The maximum annual adhesive coatings usage for this emissions unit shall not exceed 182,000 gallons (110,020 gallons, excluding water and exempt solvents), based upon a rolling, 365-day summation of the monthly adhesive coatings usage rates.
2. The maximum annual silicone usage for this emissions unit shall not exceed 62,400 gallons (28,080 gallons, excluding water and exempt solvents), based upon a rolling, 365-day summation of the monthly silicone usage rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each adhesive coating and silicone employed.
 - b. The VOC content of each adhesive coating and silicone employed, in lbs VOC/gallon, excluding water and exempt solvents, and in kg VOC/kg solids.
 - c. The volume of each adhesive coating and silicone employed, in gallons, and in gallons excluding water and exempt solvents.
 - d. The volumes of all the adhesive coatings and of all the silicones employed, in gallons, and in gallons excluding water and exempt solvents.
 - e. The rolling, 365-day summations of the adhesive coatings and of the silicones usage rates, in gallons, and in gallons excluding water and exempt solvents.
 - f. The total VOC emissions for all the adhesive coatings and silicones employed [summation of (b x c) for all adhesive coatings and silicones], in lbs.
 - g. The rolling, 365-day summation of the total VOC emissions for all the adhesive coatings and silicones employed, in tons.

IV. 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 adhesive coatings and/or silicones [i.e., for the VOC contents, in lbs/gallon of adhesive coating/silicone and in kg/kg of adhesive coating/silicone solids]. 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 submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of all exceedances of the rolling, 365-day adhesive and/or silicone usage restrictions, and the actual adhesive and/or silicone usage rates for each such 365-day period.
 - b. An identification of all exceedances of the rolling, 365-day VOC emission limitation, and the actual VOC emission rate for each such 365-day period.

The quarterly deviation (excursion) reports shall be submitted in accordance with Section A.1.c of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that summarize the total actual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation -
4.77 lbs/hour VOC

Applicable Compliance Method -
Compliance shall be determined as follows:

- i. multiply the maximum hourly adhesive coatings usage rate (gallons/hour) by the maximum VOC content of all the adhesive coatings employed (lbs/gallon);
- ii. multiply the maximum hourly silicones usage rate (gallons/hour) by the maximum VOC content of all the silicones employed (lbs/gallon); and
- iii. add 1.a.i + 1.a.ii.

- 1.b** Emission Limitation -
14.9 TPY VOC, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.c** VOC Content Limitations -
0.046 lb VOC/gallon of adhesive coating, excluding water and exempt solvents
0.010 kg VOC/kg adhesive coating solids
0.86 lb VOC/gallon of silicone, excluding water and exempt solvents
0.113 kg VOC/kg silicone solids

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.d** Usage Restrictions -
182,000 gallons (110,020 gallons, excluding water and exempt solvents) adhesive usage, as a rolling, 365-day summation

62,400 gallons (28,080 gallons, excluding water and exempt solvents) silicone usage, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** The manufacturers' formulation data or Method 24 and the equations specified in 40 CFR, 60.443 shall be used to determine the VOC contents for all the adhesive coatings and silicones.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: K051 (K051)
Activity Description: Adhesive coater/laminator #227

A. State and Federally Enforceable Section

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>
Adhesive coater/laminator #227	OAC rule 3745-31-05(A)(3) PTI 08-3372	4.77 lbs/hour volatile organic compounds (VOC)
		14.9 TPY VOC, as a rolling, 365-day summation
		0.046 lb VOC/gallon of adhesive coating, excluding water and exempt solvents
	40 CFR, Part 60, Subpart RR	0.010 kg VOC/kg adhesive coating solids
		0.86 lb VOC/gallon of silicone, excluding water and exempt solvents
		0.113 kg VOC/kg silicone solids
OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

- 2.a The 4.77 lbs/hour VOC limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The cleanup material employed in this emissions unit is water.

II. Operational Restrictions

1. The maximum annual adhesive coatings usage for this emissions unit shall not exceed 182,000 gallons (110,020 gallons, excluding water and exempt solvents), based upon a rolling, 365-day summation of the monthly adhesive coatings usage rates.
2. The maximum annual silicone usage for this emissions unit shall not exceed 62,400 gallons (28,080 gallons, excluding water and exempt solvents), based upon a rolling, 365-day summation of the monthly silicone usage rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each adhesive coating and silicone employed.
 - b. The VOC content of each adhesive coating and silicone employed, in lbs VOC/gallon, excluding water and exempt solvents, and in kg VOC/kg solids.
 - c. The volume of each adhesive coating and silicone employed, in gallons, and in gallons excluding water and exempt solvents.
 - d. The volumes of all the adhesive coatings and of all the silicones employed, in gallons, and in gallons excluding water and exempt solvents.
 - e. The rolling, 365-day summations of the adhesive coatings and of the silicones usage rates, in gallons, and in gallons excluding water and exempt solvents.
 - f. The total VOC emissions for all the adhesive coatings and silicones employed [summation of (b x c) for all adhesive coatings and silicones], in lbs.
 - g. The rolling, 365-day summation of the total VOC emissions for all the adhesive coatings and silicones employed, in tons.

IV. 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 adhesive coatings and/or silicones [i.e., for the VOC contents, in lbs/gallon of adhesive coating/silicone and in kg/kg of adhesive coating/silicone solids]. 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 submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of all exceedances of the rolling, 365-day adhesive and/or silicone usage restrictions, and the actual adhesive and/or silicone usage rates for each such 365-day period.
 - b. An identification of all exceedances of the rolling, 365-day VOC emission limitation, and the actual VOC emission rate for each such 365-day period.

The quarterly deviation (excursion) reports shall be submitted in accordance with Section A.1.c of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that summarize the total actual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation -
4.77 lbs/hour VOC

Applicable Compliance Method -
Compliance shall be determined as follows:

- i. multiply the maximum hourly adhesive coatings usage rate (gallons/hour) by the maximum VOC content of all the adhesive coatings employed (lbs/gallon);
- ii. multiply the maximum hourly silicones usage rate (gallons/hour) by the maximum VOC content of all the silicones employed (lbs/gallon); and
- iii. add 1.a.i + 1.a.ii.

- 1.b** Emission Limitation -
14.9 TPY VOC, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.c** VOC Content Limitations -
0.046 lb VOC/gallon of adhesive coating, excluding water and exempt solvents
0.010 kg VOC/kg adhesive coating solids
0.86 lb VOC/gallon of silicone, excluding water and exempt solvents
0.113 kg VOC/kg silicone solids

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.d** Usage Restrictions -
182,000 gallons (110,020 gallons, excluding water and exempt solvents) adhesive usage, as a rolling, 365-day summation

62,400 gallons (28,080 gallons, excluding water and exempt solvents) silicone usage, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** The manufacturers' formulation data or Method 24 and the equations specified in 40 CFR, 60.443 shall be used to determine the VOC contents for all the adhesive coatings and silicones.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: K052 (K052)

Activity Description: Adhesive coater/laminator #229

A. State and Federally Enforceable Section

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>
Adhesive coater/laminator #229	OAC rule 3745-31-05(A)(3) PTI 08-3372	4.77 lbs/hour volatile organic compounds (VOC)
		14.9 TPY VOC, as a rolling, 365-day summation
		0.046 lb VOC/gallon of adhesive coating, excluding water and exempt solvents
	40 CFR, Part 60, Subpart RR	0.010 kg VOC/kg adhesive coating solids
		0.86 lb VOC/gallon of silicone, excluding water and exempt solvents
		0.113 kg VOC/kg silicone solids
OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

- 2.a The 4.77 lbs/hour VOC limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The cleanup material employed in this emissions unit is water.

II. Operational Restrictions

1. The maximum annual adhesive coatings usage for this emissions unit shall not exceed 182,000 gallons (110,020 gallons, excluding water and exempt solvents), based upon a rolling, 365-day summation of the monthly adhesive coatings usage rates.
2. The maximum annual silicone usage for this emissions unit shall not exceed 62,400 gallons (28,080 gallons, excluding water and exempt solvents), based upon a rolling, 365-day summation of the monthly silicone usage rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each adhesive coating and silicone employed.
 - b. The VOC content of each adhesive coating and silicone employed, in lbs VOC/gallon, excluding water and exempt solvents, and in kg VOC/kg solids.
 - c. The volume of each adhesive coating and silicone employed, in gallons, and in gallons excluding water and exempt solvents.
 - d. The volumes of all the adhesive coatings and of all the silicones employed, in gallons, and in gallons excluding water and exempt solvents.
 - e. The rolling, 365-day summations of the adhesive coatings and of the silicones usage rates, in gallons, and in gallons excluding water and exempt solvents.
 - f. The total VOC emissions for all the adhesive coatings and silicones employed [summation of (b x c) for all adhesive coatings and silicones], in lbs.
 - g. The rolling, 365-day summation of the total VOC emissions for all the adhesive coatings and silicones employed, in tons.

IV. 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 adhesive coatings and/or silicones [i.e., for the VOC contents, in lbs/gallon of adhesive coating/silicone and in kg/kg of adhesive coating/silicone solids]. 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 submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of all exceedances of the rolling, 365-day adhesive and/or silicone usage restrictions, and the actual adhesive and/or silicone usage rates for each such 365-day period.
 - b. An identification of all exceedances of the rolling, 365-day VOC emission limitation, and the actual VOC emission rate for each such 365-day period.

The quarterly deviation (excursion) reports shall be submitted in accordance with Section A.1.c of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that summarize the total actual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation -
4.77 lbs/hour VOC

Applicable Compliance Method -
Compliance shall be determined as follows:

- i. multiply the maximum hourly adhesive coatings usage rate (gallons/hour) by the maximum VOC content of all the adhesive coatings employed (lbs/gallon);
- ii. multiply the maximum hourly silicones usage rate (gallons/hour) by the maximum VOC content of all the silicones employed (lbs/gallon); and
- iii. add 1.a.i + 1.a.ii.

- 1.b** Emission Limitation -
14.9 TPY VOC, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.c** VOC Content Limitations -
0.046 lb VOC/gallon of adhesive coating, excluding water and exempt solvents
0.010 kg VOC/kg adhesive coating solids
0.86 lb VOC/gallon of silicone, excluding water and exempt solvents
0.113 kg VOC/kg silicone solids

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.d** Usage Restrictions -
182,000 gallons (110,020 gallons, excluding water and exempt solvents) adhesive usage, as a rolling, 365-day summation

62,400 gallons (28,080 gallons, excluding water and exempt solvents) silicone usage, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** The manufacturers' formulation data or Method 24 and the equations specified in 40 CFR, 60.443 shall be used to determine the VOC contents for all the adhesive coatings and silicones.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: K053 (K053)
Activity Description: Adhesive coater/laminator #246

A. State and Federally Enforceable Section

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>
Adhesive coater/laminator #246	OAC rule 3745-31-05(A)(3) PTI 08-3372	4.77 lbs/hour volatile organic compounds (VOC)
		14.9 TPY VOC, as a rolling, 365-day summation
		0.046 lb VOC/gallon of adhesive coating, excluding water and exempt solvents
	40 CFR, Part 60, Subpart RR	0.010 kg VOC/kg adhesive coating solids
		0.86 lb VOC/gallon of silicone, excluding water and exempt solvents
		0.113 kg VOC/kg silicone solids
OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

- 2.a The 4.77 lbs/hour VOC limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The cleanup material employed in this emissions unit is water.

II. Operational Restrictions

1. The maximum annual adhesive coatings usage for this emissions unit shall not exceed 182,000 gallons (110,020 gallons, excluding water and exempt solvents), based upon a rolling, 365-day summation of the monthly adhesive coatings usage rates.
2. The maximum annual silicone usage for this emissions unit shall not exceed 62,400 gallons (28,080 gallons, excluding water and exempt solvents), based upon a rolling, 365-day summation of the monthly silicone usage rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each adhesive coating and silicone employed.
 - b. The VOC content of each adhesive coating and silicone employed, in lbs VOC/gallon, excluding water and exempt solvents, and in kg VOC/kg solids.
 - c. The volume of each adhesive coating and silicone employed, in gallons, and in gallons excluding water and exempt solvents.
 - d. The volumes of all the adhesive coatings and of all the silicones employed, in gallons, and in gallons excluding water and exempt solvents.
 - e. The rolling, 365-day summations of the adhesive coatings and of the silicones usage rates, in gallons, and in gallons excluding water and exempt solvents.
 - f. The total VOC emissions for all the adhesive coatings and silicones employed [summation of (b x c) for all adhesive coatings and silicones], in lbs.
 - g. The rolling, 365-day summation of the total VOC emissions for all the adhesive coatings and silicones employed, in tons.

IV. 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 adhesive coatings and/or silicones [i.e., for the VOC contents, in lbs/gallon of adhesive coating/silicone and in kg/kg of adhesive coating/silicone solids]. 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 submit quarterly deviation (excursion) reports that include the following:
 - a. An identification of all exceedances of the rolling, 365-day adhesive and/or silicone usage restrictions, and the actual adhesive and/or silicone usage rates for each such 365-day period.
 - b. An identification of all exceedances of the rolling, 365-day VOC emission limitation, and the actual VOC emission rate for each such 365-day period.

The quarterly deviation (excursion) reports shall be submitted in accordance with Section A.1.c of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that summarize the total actual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation -
4.77 lbs/hour VOC

Applicable Compliance Method -
Compliance shall be determined as follows:

- i. multiply the maximum hourly adhesive coatings usage rate (gallons/hour) by the maximum VOC content of all the adhesive coatings employed (lbs/gallon);
- ii. multiply the maximum hourly silicones usage rate (gallons/hour) by the maximum VOC content of all the silicones employed (lbs/gallon); and
- iii. add 1.a.i + 1.a.ii.

- 1.b** Emission Limitation -
14.9 TPY VOC, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.c** VOC Content Limitations -
0.046 lb VOC/gallon of adhesive coating, excluding water and exempt solvents
0.010 kg VOC/kg adhesive coating solids
0.86 lb VOC/gallon of silicone, excluding water and exempt solvents
0.113 kg VOC/kg silicone solids

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 1.d** Usage Restrictions -
182,000 gallons (110,020 gallons, excluding water and exempt solvents) adhesive usage, as a rolling, 365-day summation

62,400 gallons (28,080 gallons, excluding water and exempt solvents) silicone usage, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- 2.** The manufacturers' formulation data or Method 24 and the equations specified in 40 CFR, 60.443 shall be used to determine the VOC contents for all the adhesive coatings and silicones.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: K054 (K054)
Activity Description: 23 FLEXOGRAPHIC PRINTING PRESSES

A. State and Federally Enforceable Section

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>
23 flexographic printing presses	OAC rule 3745-31-05(A)(3) PTI 08-04245	7.6 lbs volatile organic compounds (VOC)/hour, excluding cleanup 12.86 TPY VOC, including cleanup The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(2)(b).
	OAC rule 3745-21-09(Y)(2)(b)	Less than or equal to 148 tons per year of inks and coatings usage in all flexographic, packaging rotogravure and publication rotogravure printing lines at the facility

2. Additional Terms and Conditions

- 2.a The 7.6 lbs/hour VOC emission limitation was developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The maximum annual inks and coatings usage in all flexographic, packaging rotogravure, and publication rotogravure printing lines at the facility shall not exceed 148 tons.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The name and identification of each ink, coating and cleanup material employed.
 - b. The density of each coating and ink employed, in lbs/gallon.
 - c. The number of gallons of each ink and coating employed.
 - d. The total inks and coatings usage, in tons (i.e., the summation of (b x c) for all coatings and inks, divided by 2,000).
 - e. The VOC content of each ink, coating, and cleanup material employed, in lbs/gallon.
 - f. The number of gallons of each cleanup material employed.
 - g. The total VOC emissions for all the inks, coatings, and cleanup materials employed (summation of (c x e) for all inks and coatings + summation of (f x e) for all cleanup materials), in lbs
2. The permittee shall maintain monthly records of the total inks and coatings usage for the facility, in tons (this is calculated by summing the total inks and coatings usage for all the emissions units at the facility).

IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the annual inks and coatings usages for the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
7.6 lbs VOC/hour, excluding cleanup

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly inks usage rate (gallons/hr) by the maximum VOC content of all the inks employed (lbs/gallon).
 - 1.b Emission Limitation -
12.86 TPY VOC, including cleanup

Applicable Compliance Method -
Compliance shall be based upon record keeping requirements specified in Section A.III.1. and shall be the sum of the twelve monthly VOC emission rates for all the inks, coatings and cleanup materials employed, divided by 2,000.
 - 1.c Emission Limitation -
148 tons per year of inks and coatings usage

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Sections A.III.1. and 2 and shall be the sum of the twelve monthly inks and coatings usage rates for the calendar year.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
23 flexographic printing presses	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (K054) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 1.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 16,770

MAGLC (ug/m3): 23,405

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

III. Monitoring and/or Record Keeping Requirements (continued)

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- 2.** If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
- 3.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: K055 (K055)

Activity Description: Coater/Laminator #268

A. State and Federally Enforceable Section

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>
Adhesive coater laminator No. 268	OAC rule 3745-31-05(A)(3) PTI 08-4106	0.04 lb volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents 0.01 kg VOC/kg of coating solids, as applied
	40 CFR, Part 60, Subpart RR	1.50 lbs/hour and 6.57 TPY VOC The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 1.50 lbs/hour VOC limitation was developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The cleanup material employed in this emissions unit is water.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating employed.
 - b. The VOC content of each coating employed, in lbs VOC/gallon, excluding water and exempt solvents, and in kg VOC/kg solids, as applied.
 - c. The total number of gallons, excluding water and exempt solvents, of each coating employed.
 - d. The total VOC emissions for all the coatings employed [summation of (b x c) for all coatings, divided by 2000], in tons.

IV. 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 (i.e., for the VOC contents, in pounds/gallon of coating and in kg/kg of coating solids). 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 submit annual reports that summarize the actual annual VOC emissions for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitations -
0.04 pound VOC per gallon of coating, excluding water and exempt solvents.
0.01 kg VOC/kg of coating solids, as applied

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
 - 1.b Emission Limitation -
1.50 lbs/hour VOC

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hour).
 - 1.c Emission Limitation -
6.57 TPY VOC

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit and shall be the sum of the twelve monthly VOC emission rates for the calendar year.
2. The manufacturers' formulation data or Method 24 and the equations specified in 40 CFR, 60.443 shall be used to determine the VOC contents for all the adhesive coatings.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Adhesive coater/laminator #268	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (K055) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: vinyl acetate

TLV (mg/m3): 35,210

Maximum Hourly Emission Rate (lbs/hr): 0.6

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 74.74

MAGLC (ug/m3): 838

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: K056 (K056)

Activity Description: Coater/Laminator #269

A. State and Federally Enforceable Section

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>
Adhesive coater laminator No. 269	OAC rule 3745-31-05(A)(3) PTI 08-4106	0.50 lb volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents 0.06 kg VOC/kg of coating solids, as applied
	40 CFR, Part 60, Subpart RR	2.14 lbs/hour and 9.37 TPY VOC The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 2.14 lbs/hour VOC limitation was developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The cleanup material employed in this emissions unit is water.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating employed.
 - b. The VOC content of each coating employed, in lbs VOC/gallon, excluding water and exempt solvents, and in kg VOC/kg solids, as applied.
 - c. The total number of gallons, excluding water and exempt solvents, of each coating employed.
 - d. The total VOC emissions for all the coatings employed [summation of (b x c) for all coatings, divided by 2000], in tons.

IV. 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 (i.e., for the VOC contents, in pounds/gallon of coating and in kg/kg of coating solids). 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 submit annual reports that summarize the actual annual VOC emissions for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitations -
0.50 pound VOC per gallon of coating, excluding water and exempt solvents.
0.06 kg VOC/kg of coating solids, as applied

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
 - 1.b Emission Limitation -
2.14 lbs/hour VOC

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hour).
 - 1.c Emission Limitation -
9.37 TPY VOC

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit and shall be the sum of the twelve monthly VOC emission rates for the calendar year.
2. The manufacturers' formulation data or Method 24 and the equations specified in 40 CFR, 60.443 shall be used to determine the VOC contents for all the adhesive coatings.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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>
Adhesive coater/laminator #269	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: L001 (L001)

Activity Description: Ultra sonic cleaner

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Ultrasonic solvent cold cleaner	OAC rule 3745-31-05 PTI 08-851	3.8 TPY volatile organic compounds (VOC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O)(2). See A.II.
	OAC rule 3745-21-09(O)(2)	

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.
- The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.
- A freeboard ratio of greater than or equal to 0.7 shall be maintained.

II. Operational Restrictions (continued)

4. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.
 - b. Store waste solvent in covered containers.
 - c. Close the cover whenever parts are not being handled in the cleaner.
 - d. Drain the cleaned parts until dripping ceases.
 - e. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.
 - f. Clean only materials that are neither porous nor absorbent.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall also maintain monthly records of the following information:
 - a. The type of solvents employed in this cold cleaner.
 - b. The vapor pressure of each solvent, in pound per square inch absolute, measured at 100 degrees Fahrenheit.
 - c. The number of gallons of each solvent employed.
 - d. The density of each solvent employed, in pounds per gallon.
 - e. The number of gallons of each solvent-waste removed for disposal.
 - f. The number of gallons of each solvent recycled to the emissions unit.
 - g. The total VOC emission rate for all the solvents employed [summation of $((c - e - f) \times d/2000)$ for all solvents], in tons.

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Director (appropriate District Office or local air agency) that summarize the total actual VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitation -
3.8 TPY VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P016 (P016)

Activity Description: Band wiping station

A. State and Federally Enforceable Section

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>
Band wiping station	OAC rule 3745-21-07(G)(2)	8 lbs/hour and 40 lbs/day organic compounds (OC)

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the band wiping operation:
 - a. The company identification for each solvent employed.
 - b. The number of gallons of each solvent employed.
 - c. The OC content of each solvent employed, in pounds per gallon.
 - d. The total OC emission rate for all the solvents employed [summation of (b x c) for all solvents], in pounds.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate, i.e., (d)/(e), in pounds per hour (average).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with Section A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation -
8 lbs/hour OC

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.b Emission Limitation -
40 lbs/day OC

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P017 (P017)
Activity Description: Band molding

A. State and Federally Enforceable Section

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>
Band molding	OAC rule 3745-31-05 PTI 08-1089	8 lbs/hour and 37.2 lbs/day organic compounds (OC), excluding cleanup
	OAC rule 3745-21-07(G)(2)	4.7 TPY OC, including cleanup The emission limitations specified by this rule are less stringent than or equivalent to the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the band molding operation:
 - a. The company identification for each molding material employed.
 - b. The number of gallons of each molding material employed.
 - c. The OC content of each molding material employed, in pounds per gallon.
 - d. The total OC emission rate for all the molding materials employed [summation of (b x c) for all molding materials], in pounds.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate, i.e., (d)/(e), in pounds per hour (average).

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The company identification for each cleanup material employed.
 - b. Whether or not each cleanup material employed is a photochemically reactive material.
 - c. The number of gallons of each cleanup material employed.
 - d. The OC content of each cleanup material employed, in pounds per gallon.
 - e. The total OC emissions for all the cleanup materials employed [summation of (c x d) for all cleanup materials, divided by 2000], in pounds.
 - f. The total OC emissions for all the molding materials employed [this is calculated by adding the daily OC emission rates (from section 1.d) for the calendar month, divided by 2000], in tons.
 - g. The total OC emissions for all the molding and cleanup materials employed (e + f), in tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions exceeded 37.2 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with Section A.1.c of the General Terms and Conditions of this permit.

2. The permittee shall submit deviation reports that identify all periods of time during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the deviation occurs.
3. The permittee shall submit annual reports that summarize the total actual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation -
8 lbs/hour OC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
 - 1.b Emission Limitation -
37.2 lbs/day OC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

Facility Name: **MONARCH MARKING SYSTEMS, INC.**

Facility ID: **08-57-09-0718**

Emissions Unit: **P017 (P017)**

V. Testing Requirements (continued)

1.c Emissions Limitation -
4.7 TPY OC, including cleanup

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 and shall be the sum of the 12 monthly OC emission rates (from Section A.III.2.g) for the calendar year.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P018 (P018)
Activity Description: Mold break station

A. State and Federally Enforceable Section

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>
mold break station	OAC rule 3745-31-05(A)(3) PTI 08-04245	2.56 lbs/hour organic compounds (OC), excluding cleanup 32 lbs/day and 5.84 TPY OC, including cleanup
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 2.56 lbs/hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each molding and cleanup material employed.
 - b. Whether or not each cleanup material employed is a photochemically reactive material.
 - c. The number of gallons of each molding and cleanup material employed.
 - d. The OC content of each molding and cleanup material, in pounds per gallon.
 - e. The total OC emission rate for all molding and cleanup materials [summation of (c) x (d) for all molding and cleanup materials], in pounds.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the organic compound emissions from the molding and cleanup materials exceeded 32 pounds per day, and the actual organic compound emissions for each such day. These quarterly deviation reports shall be submitted in accordance with Section A.1.c. of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation reports that identify all periods of time during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
2.56 lbs/hour OC, excluding cleanup

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum amount of molding materials employed (gallons/hr) by the maximum OC content of all the molding materials (lbs/gallon).
 - 1.b Emission Limitation -
32 lbs/day OC, including cleanup

Applicable Compliance Method -
Compliance shall be based upon record keeping requirements specified in Section A.III.1 of this permit.
 - 1.c Emission Limitation -
5.84 TPY OC, including cleanup

Applicable Compliance Method -
Compliance shall be based upon record keeping requirements specified in Section A.III.1. and shall be the sum of the 365 daily organic compound emission rates for the calendar year, divided by 2,000.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
mold break station	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (P018) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone

TLV (mg/m3): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 89.14

MAGLC (ug/m3): 4880

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

III. Monitoring and/or Record Keeping Requirements (continued)

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P019 (P019)
Activity Description: Mold release spray

A. State and Federally Enforceable Section

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>
mold release spray	OAC rule 3745-31-05(A)(3) PTI 08-04245	2.56 lbs/hour organic compounds (OC), excluding cleanup 32 lbs/day and 5.84 TPY OC, including cleanup
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 2.56 lbs/hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each molding and cleanup material employed.
 - b. Whether or not each cleanup material employed is a photochemically reactive material.
 - c. The number of gallons of each molding and cleanup material employed.
 - d. The OC content of each molding and cleanup material, in pounds per gallon.
 - e. The total OC emission rate for all molding and cleanup materials [summation of (c) x (d) for all molding and cleanup materials], in pounds.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the organic compound emissions from the molding and cleanup materials exceeded 32 pounds per day, and the actual organic compound emissions for each such day. These quarterly deviation reports shall be submitted in accordance with Section A.1.c. of the General Terms and Conditions of this permit.
2. The permittee shall submit deviation reports that identify all periods of time during which any photochemically reactive cleanup material was employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of the material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation -
2.56 lbs/hour OC, excluding cleanup

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum amount of molding materials employed (gallons/hr) by the maximum OC content of all the molding materials (lbs/gallon).
 - 1.b Emission Limitation -
32 lbs/day OC, including cleanup

Applicable Compliance Method -
Compliance shall be based upon record keeping requirements specified in Section A.III.1 of this permit.
 - 1.c Emission Limitation -
5.84 TPY OC, including cleanup

Applicable Compliance Method -
Compliance shall be based upon record keeping requirements specified in Section A.III.1. and shall be the sum of the 365 daily organic compound emission rates for the calendar year, divided by 2,000.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
mold release spray	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (P018) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone

TLV (mg/m3): 204.83

Maximum Hourly Emission Rate (lbs/hr): 2.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 89.14

MAGLC (ug/m3): 4880

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

III. Monitoring and/or Record Keeping Requirements (continued)

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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