



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

12/10/2010

Certified Mail

Mark Fuhrman
International Converter, Inc. - Caldwell
17153 CR 57
Caldwell, OH 43724

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0661000027
Permit Number: P0106098
Permit Type: OAC Chapter 3745-31 Modification
County: Noble

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Journal Leader. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
International Converter, Inc. - Caldwell

Issue Date: 12/10/2010

Permit Number: P0106098

Permit Type: OAC Chapter 3745-31 Modification

Permit Description: Chapter 31 modification to increase hourly emissions from 11.74 lb VOC/ hr to 37.69 lb VOC/hr on Laminator 7 (K010). With this modification, ICI is also replacing the existing catalytic incinerator with a new control device (RTO).

Facility ID: 0661000027

Facility Location: International Converter, Inc. - Caldwell
17153 CR 57,
Caldwell, OH 43724

Facility Description: Laminated Aluminum Foil Manufacturing for Flexible Packaging Uses

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Cara Cherry at Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138 or (740)385-8501. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

K010 is a web packaging rotogravure coating station used to coat metal foil, plastic film and paper. International Converter (ICI) K010, has a current hourly VOC emissions limit of 11.74 lbs/hr which is not suitable to ICIs current operation. They have requested to increase this limit to 37.69 lbs/hr to accommodate the "worst case scenario" Potential to Emit (PTE). The increase in hourly emissions will increase the PTE for K010 from 51.42 TPY to 165 TPY. As part of this permitting action, ICI is also proposing to switch control equipment from the existing catalytic oxidizer to a regenerative thermal oxidizer (RTO).

3. Facility Emissions and Attainment Status:

ICI is located in Caldwell, Noble County, Ohio. Noble County is currently in attainment for all ambient air quality standards and Caldwell is an Appendix A area. The facility currently has a federally enforceable facility-wide VOC restriction of 249 TPY that keeps them below PSD thresholds. Without additional restrictions in this permit, the potential VOC emissions for this facility would exceed 249 TPY and the facility would become major for PSD.

4. Source Emissions:

Although they are requesting an increase in K010 emissions, ICI is requesting to maintain the federally enforceable limit for VOC emissions of 249 TPY facility-wide to avoid PSD. The facility uses many different coating with varying VOC contents, currently the "worst case scenario" coating is FE4A with 72.40% VOC. This "worst case scenario" would result in 165 TPY for K010 without the requested restrictions. Restrictions include venting to the RTO, when coatings, inks, and diluents, as applied, are greater than 1.14lbs VOC per gallon, excluding water and exempt solvents, and limiting coating usage to stay under the 249 tons per rolling 12-month period facility-wide limit. The facility will also maintain monthly records to monitor their coating usage and emissions in order to stay below the 249 TPY facility-wide cap and below the 165 TPY for K010.

5. Conclusion:

The operational restrictions, emission limits, emissions testing, record keeping, and reporting requirements of this permit are sufficient to provide federally enforceable limitations to limit the potential to emit from K010 and the RTO.

6. Please provide additional notes or comments as necessary:

This facility is currently in enforcement. This modification will help address some of the recordkeeping and emission violations addressed in the enforcement case between Ohio EPA and International Converter.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	165
PE	0.26
OC	165
NOx	3.44
CO	2.89
SO ₂	0.02
HAPS	13.84
SINGLE HAPS (TOLUENE)	13.84



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
International Converter, Inc. - Caldwell**

Facility ID: 0661000027
Permit Number: P0106098
Permit Type: OAC Chapter 3745-31 Modification
Issued: 12/10/2010
Effective: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
International Converter, Inc. - Caldwell

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Authorization

Facility ID: 0661000027
Facility Description: Coating/laminating facility.
Application Number(s): A0039175
Permit Number: P0106098
Permit Description: Chapter 31 modification to increase hourly emissions from 11.74 lb VOC/ hr to 37.69 lb VOC/hr on Laminator 7 (K010). With this modification, ICI is also replacing the existing catalytic incinerator with a new control device (RTO).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 12/10/2010
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

International Converter, Inc. - Caldwell
17153 CR 57
Caldwell, OH 43724

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0106098
Permit Description: Chapter 31 modification to increase hourly emissions from 11.74 lb VOC/ hr to 37.69 lb VOC/hr on Laminator 7 (K010). With this modification, ICI is also replacing the existing catalytic incinerator with a new control device (RTO).

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

Emissions Unit ID:	K010
Company Equipment ID:	LAMINATOR # 7
Superseded Permit Number:	06-07864
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

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

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions



Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The following emissions unit at the facility are subject to 40 CFR Part 63, Subpart KK; K001, K002, K003, K004, K005, K006, K009 and K010 and all other emissions from facility operations. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

3. The maximum material usage for emissions units K001, K002, K003, K004, K005, K006, K009 and K010 combined shall not cause volatile organic compound (VOC) emissions to exceed 249.0 tons as a rolling, 12-month summation, calculated using the following formulas:

a) X = sum from i=1 to n of (P_i_c)(VOC_i_c)(1-CF_i_u) + (P_i_u)(VOC_i_u) / 2000lbs
where:

X= tons of VOC emissions per month; and

where the controlled emissions are represented by:

P_i_c = monthly usage of each coating, ink, and cleanup material i, in gallons or pounds controlled.

VOC_i_c =VOC content of each coating, ink, and cleanup material i, in pounds VOC per gallon or percent by weight controlled.

CF_i_u= overall control efficiency 0.81, or as established in the most recent performance test; and

where the uncontrolled emissions are represented by:

P_i_u =monthly usage of each coating, ink, and cleanup material i, in gallons or pounds uncontrolled.

VOC_i_u =VOC content of each coating, ink, and cleanup material i, in pounds VOC per gallon or percent by weight, uncontrolled.

n= total number of coatings; and

b) n=12
sum from i=1 to n of X is less than or equal to 249.0 tons per year VOC as a rolling 12-month summation

Potential emissions from deminimis and exempt sources are less than one ton of VOC per year, combined.

The permittee has existing records that are sufficient to demonstrate compliance with the rolling, 12-month emissions limitation upon issuance of this permit.

4. Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit organic HAP emissions to no more than 5 percent of the organic HAP applied for the month; or to no more than 4 percent of the mass of ink, coatings, varnishes, adhesive, primers, solvents, reducers, thinners, and other materials applied for the month; or no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents ink, coatings, varnishes, adhesive, primers, solvents, reducers, thinners, applied for the month. The owner of or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures in (b)(1) through (b)(10).
5. Operational Restrictions
 - b) Except when employing coatings, inks, and diluents that are less than 1.14 lbs VOC per gallon, excluding water and exempt solvents, all of the VOC emissions from the following emissions units shall be vented to a thermal oxidizer and shall meet the operational, monitoring, and record keeping requirements of this permit, when one or more of the emissions unit is in operation: K001, K002, K003, K004, K005, K006, K009 and K010.
 - c) The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the control efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.
 - d) See 40 CFR Part 63, Subpart KK (40 CFR 63.820-63.839).
6. Monitoring and/or Recordkeeping Requirements
 - a) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable combustion temperature within the thermal oxidizer, during any period of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
 - b) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following

information each day the thermal oxidizer is required to demonstrate compliance with the VOC limitation for each emissions unit.

- (1) all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - (2) a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).
- c) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- (1) the date and time the deviation began;
 - (2) the magnitude of the deviation at that time;
 - (3) the date the investigation was conducted;
 - (4) the name(s) of the personnel who conducted the investigation; and
 - (5) the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- (1) a description of the corrective action;
- (2) the date corrective action was completed;
- (3) the date and time the deviation ended;
- (4) the total period of time (in minutes) during which there was a deviation;
- (5) the temperature readings immediately after the corrective action was implemented; and
- (6) the name(s) of the personnel who performed the work.

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office

or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a permit modification

- d) The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K003, K004, K005, K006, K009 and K010, combined for all periods of time during which the coatings and inks are vented to the thermal oxidizer:
- (1) the company identification for each coating, ink, and cleanup material employed;
 - (2) the number of gallons or pounds of each coating, ink, and cleanup material employed;
 - (3) the VOC content of each coating, ink, and cleanup material, as applied, in pounds per gallon or percent by weight; and
 - (4) the calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons and calculated according to controlled emissions portion of the formula in 3.a).
- e) The permittee shall collect and record the following information on a monthly basis for emissions units K001, K002, K003, K004, K005, K006, K009 and K010, combined for all periods of time during which the coatings and inks are not vented to the thermal oxidizer:
- (1) the company identification for each coating, ink, and cleanup material employed;
 - (2) the number of gallons or pounds of each coating, ink, and cleanup material employed ;
 - (3) the VOC content of each coating, ink, and cleanup material, as applied, in pounds per gallon or percent by weight; and
 - (4) the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds calculated according to the uncontrolled emissions portion of the formula specified in 3.a).
- f) The permittee shall collect and record each month the rolling, 12-month summation of the total VOC emissions for the facility, in tons, calculated according to the formula specified in 3.b).
- g) See 40 CFR Part 63, Subpart KK (40 CFR 63.820-63.839).

7. Reporting Requirements

- b) The permittee shall submit quarterly summaries of the following records:
- (1) each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

- (2) any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
- (3) each incident of deviation described in “(1)” or “(2)” (above) where a prompt investigation was not conducted;
- (4) each incident of deviation described in “(1)” or “(2)” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
- (5) each incident of deviation described in “(1)” or “(2)” where proper records were not maintained for the investigation and/or the corrective action(s).

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

- c) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility-wide VOC limitation.
- d) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- e) See 40 CFR Part 63, Subpart KK (40 CFR 63.820-63.839).

8. Testing Requirements

- b) Compliance with the emissions limitations in 3.,4, and 5.b) of these terms and conditions shall be determined in accordance with the following methods:

- (1) Emissions Limitations:

The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the control efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

Applicable Compliance Method:

Compliance with the capture and control efficiency limitations shall be demonstrated based upon the applicable emission tests specified in 7.b)

- (2) Emissions Limitations:

The maximum material usage for emissions units combined shall not cause VOC emissions to exceed 249.0 tons as a rolling, 12-month summation, calculated using the formula in 3.

Applicable Compliance Method:



Compliance with the rolling, 12-month VOC emissions limitation shall be demonstrated based upon the record keeping requirements specified in d-f.

(3) Emissions Limitations:

Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit organic HAP emissions to no more than 5 percent of the organic HAP applied for the month; or to no more than 4 percent of the mass of ink, coatings, varnishes, adhesive, primers, solvents, reducers, thinners, and other materials applied for the month; or no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents ink, coatings, varnishes, adhesive, primers, solvents, reducers, thinners, applied for the month. The owner of or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures in (b)(1) through (b)(10).

Applicable Compliance Method:

Compliance shall be demonstrated by one or more of the testing requirements specified in the following table.

40 CFR Part 63, Subpart KK requirement	40 CFR Part 63, Subpart KK Compliance with requirement
Each material specified in 63.825(b)(1) applied during the month shall contain no more than 0.04 weight-fraction organic HAP, on an as purchased basis.	Determine weight fraction organic HAP as specified in 63.827(b)(2).
Each material specified in 63.825(b)(2) applied during the month shall contain no more than 0.04 weight-fraction organic HAP, on a monthly average, as-applied basis.	Determine the organic HAP content as specified in 63.827(b)(2). Calculate the monthly average as-applied organic HAP content using Equation 3 in 63.825(b)(2)(ii).
Each material specified in 63.825(b)(3) applied during the month shall contain no more than 0.04 weight-fraction organic HAP, on a monthly average, as-applied basis or contains no more than 0.20 kg of organic HAP per kg of solids applied on a monthly average, as-applied basis.	Determine the organic HAP content by using the procedures of 63.825(b)(2) to determine which materials meet the 0.04 weight-fraction organic HAP limitation; or determine the as-applied solids content as specified in 63.827(c)(2) or (c)(3) of all materials that do not meet the 0.04 weight-fraction organic HAP limitation of this section. The owner or operator may calculate the monthly average as-applied solids content which are reduced, thinned or diluted prior to application using Equation 4; and calculate the as-applied organic HAP to solids ratio for all materials which do not



	meet the 0.04 weight-fraction organic HAP limitation using Equation 5.
As specified in 63.825(b)(4), The monthly average as-applied organic HAP content of all materials applied shall be less than 0.04 kg HAP per kg of material applied.	Determine organic HAP content using Equation 6 in 63.825(b)(4).
As specified in 63.825(b)(5), The monthly average as-applied organic HAP content on the basis of solids applied, shall contain no more than 0.20 kg HAP per kg of solids applied.	Determine organic HAP content using Equation 7 in 63.825(b)(5).
As specified in 63.825(b)(6), the total monthly organic HAP applied shall be less than the calculated equivalent allowable organic HAP.	Determine total monthly organic HAP applied using Equation 8 in 63.825(b)(6). Determine the monthly calculated equivalent allowable organic HAP using Equation 17 in 63.825(e)(5).
As specified in 63.825(b)(7), operate capture system and control device and demonstrate overall organic HAP control efficiency of at least 95 percent for each month; or	Demonstrate compliance through performance tests of capture and control device efficiency and continuing compliance through continuous monitoring of operating parameters as specified in 63.825(f)(3) and 63.827(d)-(f); or Demonstrate compliance through an initial capture efficiency test, continuous monitoring of the control device and continuous monitoring of a capture system operating parameter as specified in 63.825(f)(4) and 63.827(e)-(f); and Determine the organic HAP emissions for the month as specified in 63.825(f)(7).
As specified in 63.825(b)(8), operate capture system and control device and limit the organic HAP emission rate to no more than 0.20 kg organic HAP emitted per kg solids applied as determined on a monthly average, as –applied basis; or	Demonstrate compliance through performance tests of capture and control device efficiency and continuing compliance through continuous monitoring of operating parameters as specified in 63.825(f)(3) and 63.827(d)-(f); or Demonstrate compliance through an



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	<p>initial capture efficiency test, continuous monitoring of the control device and continuous monitoring of a capture system operating parameter as specified in 63.825(f)(4) and 63.827(e)-(f); and</p> <p>Determine the organic HAP emissions for the month as specified in 63.825(f)(7).</p> <p>The solids content shall be determined as specified in 63.825(f)(6).</p>
<p>As specified in 63.825(b)(9), operate capture system and control device and limit the organic HAP emission rate to no more than 0.04 kg organic HAP emitted per kg material applied as determined on a monthly average, as –applied basis.</p>	<p>Demonstrate compliance through performance tests of capture and control device efficiency and continuing compliance through continuous monitoring of operating parameters as specified in 63.825(f)(3) and 63.827(d)-(f); or</p> <p>Demonstrate compliance through an initial capture efficiency test, continuous monitoring of the control device and continuous monitoring of a capture system operating parameter as specified in 63.825(f)(4) and 63.827(e)-(f); and</p> <p>Determine the organic HAP emissions for the month as specified in 63.825(f)(7).</p>
<p>As specified in 63.825(b)(10), operate capture system and control device and limit the monthly organic HAP emission rate to less than the monthly allowable emissions as determined in accordance with 63.825(e).</p>	<p>Demonstrate compliance through performance tests of capture and control device efficiency and continuing compliance through continuous monitoring of operating parameters as specified in 63.825(f)(3) and 63.827(d)-(f); or</p> <p>Demonstrate compliance through an initial capture efficiency test, continuous monitoring of the control device and continuous monitoring of a capture system operating parameter as specified in 63.825(f)(4) and 63.827(e)-(f); and</p> <p>Determine the organic HAP emissions for the month as specified in 63.825(f)(7).</p> <p>The solids content shall be determined</p>



	as specified in 63.825(f)(6).
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- c) The permittee shall conduct, or have conducted, emissions testing for this emissions units in accordance with the following requirements:
- (1) the emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit;
 - (2) the emissions testing shall be conducted to demonstrate compliance with 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the control efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it;
 - (3) the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement);
 - (4) the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases;
 - (5) the emission testing shall be conducted in accordance with 40 CFR Part 60, USEPA method 25 or USEPA method 25A for Volatile Organic Compounds; Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
 - (6) the capture efficiency of the vapor collection system shall be the percent of total mass emissions of VOC emitted from the source which are vented to the vapor control system. If this efficiency is based upon an emissions test utilizing USEPA method 25 or 25A, the mass emissions of VOC as carbon shall be employed in the efficiency determination;
 - (7) the overall control efficiency (in per cent) of any control equipment for VOC emissions shall be the vapor capture efficiency multiplied by the vapor control efficiency and divided by one hundred;
 - (8) the total mass emission rate of VOC from a source equipped with control equipment shall be the sum of VOC emissions from the vapor control system, VOC emissions not collected by the vapor collection system and VOC emissions from any losses associated with the vapor collection system and vapor control system; and

- (9) the emissions testing shall be conducted while the emissions unit is operating at or near its maximum capacity and in accordance with OAC rule 3745-21-10(C), unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission tests.

Personnel from the facility be permitted to witness the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission tests shall be submitted to the Ohio EPA Southeast District Office within one month following completion of the tests. The permittee may obtain additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

C. Emissions Unit Terms and Conditions



1. K010, LAMINATOR # 7

a) Operations, Property and/or Equipment Description:

(Laminator No. 7) web packaging rotogravure coating station used to coat metal foil, plastic film and paper, and controlled with a 30,000 SCFM Regenerative Thermal Oxidizer. Chapter 31 modification to permit #06-07864, issued 11/22/2005, to increase the current hourly Volatile Organic Compound (VOC) limit from 11.74 lbs/hr to 37.69 lbs/hr. The increase to 37.69 lb/hr will increase the current annual VOC limit of 51.42 TPY to 165 TPY.

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	VOC emissions shall not exceed 37.69 lbs/hr and 165 TPY. See b)(2)a through b)(2)c Nitrogen oxide (NO _x) emissions shall not exceed 0.78 lb/hr and 3.44 TPY. Carbon Monoxide (CO) emissions shall not exceed 0.66 lb/hr and 2.89 TPY. The requirement of this rule also includes compliance with the requirements of 40 CFR Part 63 Subpart KK.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid PSD	See Section B.3
c.	40 CFR Part 63, Subpart KK (40 CFR 63.820(a)(1) & 63.821(2)) [In accordance with 40 CFR 63.825 B, Subpart KK, this emissions unit is a product packaging rotogravure press located at an existing major source of HAPS.]	This emissions unit shall limit organic HAPS emissions to no more than 5 percent of the organic HAP applied for the month; or no more than 4 percent of the mass of inks, coating, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.
d.	40 CFR Part 63.1-63.15 (63.823)	Table 1 of 40 CFR 63. Subpart KK– Applicability of General Provisions to Subpart KK shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.
e.	OAC rule 3745-21-09(Y)(1)(b)	The emissions limitations required pursuant to this rule are less stringent than emissions limitations required pursuant to this OAC 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The emissions unit shall be vented to the thermal oxidizer whenever the VOC content of all coatings, inks, and diluents, as applied, is greater than 1.14 lbs VOC per gallon, excluding water and exempt solvents.
- b. Except when employing only compliant materials, all of the VOC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- c. The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart KK (40 CFR 63.820-63.839)

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable combustion temperature within the thermal oxidizer, during any period of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the

thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

- (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (3) The permittee shall maintain the records of the results from the stack testing conducted to demonstrate compliance with the capture and control efficiency and/or the records documenting the VOC content of the coatings/inks applied. These records shall be made available upon request.
- (4) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

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

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

- (5) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a permit modification.
- (6) The permittee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are vented to the thermal oxidizer:
 - a. the company identification for each coating, ink, and cleanup material employed; in the emissions unit;
 - b. the number of gallons or percent by weight, and pounds per gallon of each coating, ink, and cleanup material employed in the emissions unit;
 - c. the VOC content of each coating, ink, and cleanup material, as applied, in pounds per gallon or percent by weight, and pounds per gallon, excluding water and exempted solvents employed;
 - d. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (ie., the sum of (b.)(c.)) for all coatings, inks and cleanup materials;

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- e. The total numbers of hours the emissions unit was in operation and the coatings and inks were vented to the thermal oxidizer;
 - f. The calculated, controlled VOC emission rate from all coatings, inks, and cleanup materials, in tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and
 - g. The average hourly controlled VOC emission rate, in pounds per hour.
- (7) The permittee shall collect and record the following information on a daily basis for this emissions unit for all periods of time during which the coatings and inks are not vented to the thermal oxidizer:
- a. the company identification for each coating, ink, and cleanup material employed in the emissions unit;
 - b. the number of gallons or pounds of each coating, ink, and cleanup material employed in the emissions unit;
 - c. the VOC content of each coating, ink, and cleanup material, as applied, in pounds per gallon or percent by weight and pounds per gallon, excluding water and exempted solvents employed;
 - d. the total uncontrolled VOC emission rate from all coatings, inks, and cleanup materials, in pounds per day (i.e., the sum of (b.)(c.) for all coatings, inks and cleanup materials;
 - e. The total numbers of hours the emissions unit was in operation and the coatings and inks were not vented to the thermal oxidizer;
 - f. The average hourly uncontrolled VOC emission rate, in pounds per hour.
- (8) The permittee shall also record, on a daily basis, all periods of time when this emissions unit was in operation and employing coatings and/or inks that contained more than 1.14 pounds of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings and or inks were not vented to the thermal oxidizer.
- (9) See 40 CFR Part 63, Subpart KK (40 CFR 63.820-63.839).
- e) Reporting requirements
- (1) The permittee shall submit quarterly summaries of the following records:
- a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
- c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s).

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

- (2) The permittee shall submit quarterly deviations (excursion) reports that include and identify each day during which the average hourly VOC emissions from the coatings, inks, and cleanup materials exceed 37.69 lbs/hr, and the actual average hourly VOC emissions for each such day.
 - (3) The permittee shall submit quarterly deviations (excursion) reports that identify all periods of time when this emissions unit was in operation and employing coatings, inks, and cleanup materials that contain more than 1.14 lbs of VOC per gallon, excluding water and exempt solvents, and the emissions from such coatings, inks, and cleanup materials were not vented to the Regenerative Thermal Oxidizer (RTO).
 - (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (5) See 40 CFR Part 63, Subpart KK (40 CFR 63.820-63.839).
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitations:

The capture and control system shall provide not less than 81 percent reduction, by weight, in the overall VOC emissions from the coating lines and the reduction efficiency of the RTO shall not be less than 90 percent by weight, for the VOC emissions vented to it.

Applicable Compliance Method:

Compliance with the capture and control efficiency limitations shall be demonstrated by the testing requirements specified in (f)(2).



b. Emissions Limitations:

This emissions unit shall limit organic HAPS emissions to no more than 5 percent of the organic HAP applied for the month; or no more than 4 percent of the mass of inks, coating, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

Applicable Compliance Method:

Compliance shall be demonstrated by one or more of the testing requirements specified in the following table.

Table with 2 columns: 40 CFR Part 63, Subpart KK requirement and 40 CFR Part 63, Subpart KK Compliance with requirement. It contains three rows detailing testing methods for organic HAP emissions.



	meet the 0.04 weight-fraction organic HAP limitation using Equation 5.
As specified in 63.825(b)(4), The monthly average as-applied organic HAP content of all materials applied shall be less than 0.04 kg HAP per kg of material applied.	Determine organic HAP content using Equation 6 in 63.825(b)(4).
As specified in 63.825(b)(5), The monthly average as-applied organic HAP content on the basis of solids applied, shall contain no more than 0.20 kg HAP per kg of solids applied.	Determine organic HAP content using Equation 7 in 63.825(b)(5).
As specified in 63.825(b)(6), the total monthly organic HAP applied shall be less than the calculated equivalent allowable organic HAP.	Determine total monthly organic HAP applied using Equation 8 in 63.825(b)(6). Determine the monthly calculated equivalent allowable organic HAP using Equation 17 in 63.825(e)(5).
As specified in 63.825(b)(7), operate capture system and control device and demonstrate overall organic HAP control efficiency of at least 95 percent for each month; or	Demonstrate compliance through performance tests of capture and control device efficiency and continuing compliance through continuous monitoring of operating parameters as specified in 63.825(f)(3) and 63.827(d)-(f); or Demonstrate compliance through an initial capture efficiency test, continuous monitoring of the control device and continuous monitoring of a capture system operating parameter as specified in 63.825(f)(4) and 63.827(e)-(f); and Determine the organic HAP emissions for the month as specified in 63.825(f)(7).
As specified in 63.825(b)(8), operate capture system and control device and limit the organic HAP emission rate to no more than 0.20 kg organic HAP emitted per kg solids applied as determined on a monthly average, as –applied basis; or	Demonstrate compliance through performance tests of capture and control device efficiency and continuing compliance through continuous monitoring of operating parameters as specified in 63.825(f)(3) and 63.827(d)-(f); or Demonstrate compliance through an



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	<p>initial capture efficiency test, continuous monitoring of the control device and continuous monitoring of a capture system operating parameter as specified in 63.825(f)(4) and 63.827(e)-(f); and</p> <p>Determine the organic HAP emissions for the month as specified in 63.825(f)(7).</p> <p>The solids content shall be determined as specified in 63.825(f)(6).</p>
<p>As specified in 63.825(b)(9), operate capture system and control device and limit the organic HAP emission rate to no more than 0.04 kg organic HAP emitted per kg material applied as determined on a monthly average, as –applied basis.</p>	<p>Demonstrate compliance through performance tests of capture and control device efficiency and continuing compliance through continuous monitoring of operating parameters as specified in 63.825(f)(3) and 63.827(d)-(f); or</p> <p>Demonstrate compliance through an initial capture efficiency test, continuous monitoring of the control device and continuous monitoring of a capture system operating parameter as specified in 63.825(f)(4) and 63.827(e)-(f); and</p> <p>Determine the organic HAP emissions for the month as specified in 63.825(f)(7).</p>
<p>As specified in 63.825(b)(10), operate capture system and control device and limit the monthly organic HAP emission rate to less than the monthly allowable emissions as determined in accordance with 63.825(e).</p>	<p>Demonstrate compliance through performance tests of capture and control device efficiency and continuing compliance through continuous monitoring of operating parameters as specified in 63.825(f)(3) and 63.827(d)-(f); or</p> <p>Demonstrate compliance through an initial capture efficiency test, continuous monitoring of the control device and continuous monitoring of a capture system operating parameter as specified in 63.825(f)(4) and 63.827(e)-(f); and</p> <p>Determine the organic HAP emissions for the month as specified in 63.825(f)(7).</p> <p>The solids content shall be determined</p>



	as specified in 63.825(f)(6).
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c. Emissions Limitations:

VOC emissions shall not exceed 37.69 lbs/hr and 165 TPY.

Applicable Compliance Method:

Compliance with the lbs/hr VOC emissions limitation shall be demonstrated by the testing requirements specified in f)(2) and the recordkeeping requirements in d)(6) and d)(7).

USEPA Method 24, 24A, or formulation data shall be used to determine the VOC content of each coating and ink employed. Formulation data shall be used to determine the VOC content of each cleanup material.

Compliance with the tons per year emission limitation shall be determined by summing the daily emissions as recorded in d)(6)f. and d)(7)d. for each day of operation in the calendar year and dividing by 2,000 lbs per ton.

d. Emissions Limitations

NOx emissions shall not exceed 0.78 pounds per hour and 3.44 tons per year.

Applicable Compliance Methods:

The hourly emissions shall be determined by dividing 100 lbs/MMscf, the emission factor specified in AP-42, section 1.4-1, by 1,020 Btu/scf for natural gas, obtained from AP-42 section 1.4 Table 1.4-2, multiplied by the total burner rating 8 MMBtu/hr, in order to get the NOx emission limitation for this unit.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton.

If required, nitrogen oxides emissions shall be determined according to USEPA test Methods 1 - 4, and 7 or 7E.

e. Emissions Limitations

CO emissions shall not exceed 0.66 pounds per hour and 2.89 tons per year.

Applicable Compliance Methods:

The hourly emissions shall be determined by dividing 84 lbs/MMscf the emission factor specified in AP-42, section 1.4-1, by 1,020 Btu/scf for natural gas, obtained from AP-42 section 1.4 Table 1.4-2, multiplied by the total burner rating 8 MMBtu/hr, in order to get the CO emission limitation for this unit.



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Compliance with the annual emission limitation shall be determined by multiplying the lb/MMBtu emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton.

If required, CO emissions shall be determined according to USEPA test Method 1-4, and 10 of 40 CFR Part 60, Appendix A.

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- (2) The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
- a. The emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit;
 - b. the emissions testing shall be conducted to demonstrate compliance with the 90% control efficiency and 81% control, and hourly VOC mass emission limitation;
 - c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.);
 - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases;
 - e. The emission testing shall be conducted in accordance with 40 CFR Part 60, USEPA method 25 or USEPA method 25A for Volatile Organic Compounds; Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;
 - f. The capture efficiency of the vapor collection system shall be the per cent of total mass emissions of VOC emitted from the source which are vented to the vapor control system. If this efficiency is based upon an emissions test utilizing USEPA method 25 or 25A, the mass emissions of VOC as carbon shall be employed in the efficiency determination;
 - g. The overall control efficiency (in per cent) of any control equipment for VOC emissions shall be the vapor capture efficiency multiplied by the vapor control efficiency and divided by one hundred;
 - h. The total mass emission rate of VOC from a source equipped with control equipment shall be the sum of VOC emissions from the vapor control system, VOC emissions not collected by the vapor collection system and VOC emissions from any losses associated with the vapor collection system and vapor control system; and

- i. The emissions testing shall be conducted while the emissions unit is operating at or near its maximum capacity and in accordance with OAC rule 3745-21-10(C), unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission tests.

Personnel from the facility be permitted to witness the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission tests shall be submitted to the Ohio EPA Southeast District Office within one month following completion of the tests. The permittee may obtain additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

g) **Miscellaneous Requirements**

- (1) None.