Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/31/2011

Certified Mail

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

MIKE KUBRIN
Schneller LLC
6019 POWDERMILL RD.
KENT, OH 44240-7109

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1667040015
Permit Number: P0107304
Permit Type: Administrative Modification
County: Portage

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District. 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.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
ARAQMD; Pennsylvania; West Virginia; Canada

Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	1667040015
Facility Name:	Schneller LLC
Facility Description:	Coated Fabrics, Not Rubberized.
Facility Address:	6019 POWDERMILL RD. KENT, OH 44240-7109 Portage County
Permit #:	P0107304, Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Record Courier on 02/26/2011. The comment period ended on 03/28/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

a. No comments were received.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Schneller LLC

Facility ID:	1667040015
Permit Number:	P0107304
Permit Type:	Administrative Modification
Issued:	3/31/2011
Effective:	3/31/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Schneller LLC

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 15
1. K005, ROTARY SCREEN 16
2. K006, SILKSCREEN 25
3. Emissions Unit Group - Group 1: K001, K003, K004, K007, ... 29

Authorization

Facility ID: 1667040015
Facility Description: Coated Fabrics, Not Rubberized.
Application Number(s): A0040076
Permit Number: P0107304
Permit Description: Administrative modification of Permits to Install #16-1557, #16-01601, #16-01949, #16-02186, and #16-02376 to change the applicable MACT standard from 40 CFR Part 63, Subpart JJJJ to 40 CFR Part 63, Subpart KK and to adjust the hourly and/or annual emission limitations of emissions units K001, K004, and K006. This permit covers four reverse roll coating lines with optional in-line rotogravure station (K001, K003, K004, and K007), one quad roll coating line with optional in-line rotogravure station (K005), and one silk screen printing line (K006).
Permit Type: Administrative Modification
Permit Fee: $600.00
Issue Date: 3/31/2011
Effective Date: 3/31/2011

This document constitutes issuance to:

Schneller LLC
6019 POWDERMILL RD.
KENT, OH 44240-7109

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:

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

The above named entity is hereby granted a 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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107304
Permit Description: Administrative modification of Permits to Install #16-1557, #16-01601, #16-01949, #16-02186, and #16-02376 to change the applicable MACT standard from 40 CFR Part 63, Subpart JJJJ to 40 CFR Part 63, Subpart KK and to adjust the hourly and/or annual emission limitations of emissions units K001, K004, and K006. This permit covers four reverse roll coating lines with optional in-line rotogravure station (K001, K003, K004, and K007), one quad roll coating line with optional in-line rotogravure station (K005), and one silk screen printing line (K006).

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

Emissions Unit ID:	**K005**
Company Equipment ID:	ROTARY SCREEN
Superseded Permit Number:	16-01601
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K006**
Company Equipment ID:	SILKSCREEN
Superseded Permit Number:	16-01557
General Permit Category and Type:	Not Applicable

Group Name: Group 1

Emissions Unit ID:	**K001**
Company Equipment ID:	80-LINE
Superseded Permit Number:	16-01949
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	100-LINE
Superseded Permit Number:	16-02186
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	90-LINE
Superseded Permit Number:	16-01601
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K007**
Company Equipment ID:	UV COATER
Superseded Permit Number:	16-02376
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 Akron Regional Air Quality Management District.

(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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.

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 Akron Regional Air Quality

Management District. 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

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.

1. Schneller, LLC has requested to restrict the emissions of volatile organic compounds (VOC) to 222.8 tons per year based upon the rolling, 12-month summation of the monthly emission rates. The company proposed this emission limitation to avoid being classified as a major source for Prevention of Significant Deterioration (PSD). Schneller, LLC has accepted this emission limitation as a facility-wide cap on VOC emissions from the following emissions units: K001, K003, K004, K005, K006, K007, and P002.

2. In order to determine compliance with the facility-wide VOC emission limitation, the permittee shall maintain monthly records of the following information for emissions units: K001, K003, K004, K005, K006, K007, and P002.

   a) The permittee shall collect and record the following information each month for each controlled emissions units K001, K003, K004, K005, and K007:

      (1) the name and identification number of each coating employed, as applied;

      (2) the VOC content of each coating employed, in pounds per gallon, as applied;

      (3) the number of gallons of each coating employed;

      (4) the uncontrolled VOC emissions from all the coatings employed, in ton(s) per month for each emissions unit (i.e., the sum of a)(2) times a)(3) for all coatings applied during the month, divided by 2,000 pounds per ton);

      (5) the calculated, controlled VOC emission rate for all coatings employed, in ton(s) per month for each emissions unit (i.e., the uncontrolled VOC emission rate, calculated in a)(4) above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance);

      (6) the name and identification of each cleanup material employed;

      (7) the VOC content of each cleanup material employed, as applied;

      (8) the number of gallons of each cleanup material employed;

      (9) the VOC emission rate from all cleanup materials employed, in tons per month for each emissions unit (i.e., the sum of a)(7) times a)(8) for each cleanup material, divided by 2000 pounds per ton);

      (10) the total VOC emission rate from all coatings and cleanup materials employed for each emissions unit (i.e., a)(5) plus a)(9) for each emissions unit); and

      (11) the total VOC emission rate from all coatings and cleanup materials employed for all controlled emissions units (K001, K003, K004, K005, and K007), in tons per month (i.e., the summation of the VOC emissions from all emissions units in a)(10) above).

b) The permittee shall collect and record the following information each month for emissions unit K006:

(1) the name and identification number of each coating and cleanup material, as applied;

(2) the VOC content of each coating and cleanup material, in pounds per gallon, as applied;

(3) the number of gallons of each coating and cleanup material employed; and

(4) the total VOC emissions from all coatings and cleanup materials, in tons per month (i.e., the sum of b)(2) times b)(3) for each coating plus the sum of b)(2) times b)(3) for each cleanup material, divided by 2000 pounds per ton).

c) The permittee shall collect and record the following information each month for emissions unit P002:

(1) the amount of material mixed, in pounds per month;

(2) the VOC emission rate from the mixing operation, excluding cleanup material, in tons per month (i.e., multiply the emissions factor of 0.00356* pound of VOC per pound of material mixed by c)(1), divided by 2000 pounds per ton);

(3) the name and identification of each cleanup material employed;

(4) the VOC content of each cleanup material, in pounds of VOC per gallon, as applied;

(5) the number of gallons of each cleanup material employed;

(6) the VOC emission rate for all cleanup materials employed, in tons per month (i.e., the sum of c)(4) times c)(5) for each cleanup material, divided by 2000 pounds per ton);

(7) the total VOC emission rate from the mixing operation and all cleanup materials employed, in tons per month (i.e., the sum of c)(2) plus c)(6)).

*The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.

d) The permittee shall collect and record the following information each month for the facility (emissions units K001, K003, K004, K005, K006, K007, and P002):

(1) the VOC emissions from all the materials employed, in ton(s) per month, i.e., [3.a)(11) + 3)(b)(4) + 3.c)(7)],; and

(2) the VOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in d)(1) above, for the present month plus the previous 11 months of operation, in ton(s).

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

4. Compliance with the emission limitation in 2 shall be determined in accordance with the following method:

   a) Emission Limitation:

      222.8 tons of VOC per year based upon the rolling, 12-month summation of the monthly emission rates

      Applicable Compliance Method:

      Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 3.a), 3.b), 3.c), and 3.d) above.

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

C. Emissions Unit Terms and Conditions

1. K005, ROTARY SCREEN

Operations, Property and/or Equipment Description:

Quad roll coater with optional in-line rotogravure station and a 1.0 MM Btu/hour natural gas fired oven - Rotary Screen.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	The emissions of volatile organic compounds (VOC) shall not exceed 7.83 pounds per hour for coatings and 34.3 tons per year for coatings and cleanup materials. The thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC and the capture equipment shall achieve a capture efficiency which is at least 95 percent, by weight, for VOC. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart KK.
b.	OAC rule 3745-17-07(A)	For the natural gas fired oven, visible particulate emissions (PE) from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10	For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.
d.	OAC rule 3745-21-09(B)(6) (In lieu of complying with OAC rule 3745-21-09(F)(1) and (G))	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-09(F)(2)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See c)(1) below.
f.	OAC rule 3745-21-09(H)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-21-07(G)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)b.
h.	OAC rule 3745-21-07(M)(2)	The emission limitations required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)c.
i.	40 CFR Part 60, Subpart FFF	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The temperature sensor is located in the combustion chamber at the exhaust outlet. This sensor location and monitoring, record keeping, and reporting requirements of 40 CFR Part 63, Subpart KK have been deemed to satisfy the monitoring, record keeping, and reporting requirements of 40 CFR Part 60, Subpart FFF.
j.	40 CFR Part 63, Subpart KK	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.
k.	40 CFR Part 63, Subpart A (40 CFR Part 63.823)	Table 1 to Subpart KK of Part 63 – Applicability of General Provisions to Subpart KK of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		15 apply.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation was established 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.

However, if any proposed change(s), such as with production capacity, line speed, the types and/or quantities of materials used or processed, or anything else that increases the potential emission of any air pollutant for this emissions unit, then the permittee shall apply for and obtain either a chapter 31 modification or an administrative modification to the permit to install prior to the change(s).

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)g.

c. The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: b)(1)h.

c) Operational Restrictions

(1) Work practice standards for cleaning materials.

Unless emissions to the atmosphere are controlled by an approved emission control system with an overall control efficiency of at least ninety per cent, any person using an organic solvent for cleanup shall:

a. Store all VOC containing cleaning materials and used shop towels in closed containers;

b. Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;

c. Minimize spills of VOC-containing cleaning materials;

d. Convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

e. Minimize VOC emission from cleaning of storage, mixing, and conveying equipment.

d) Monitoring and/or Recordkeeping Requirements

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

Section:	Requirement:
63.828(a)(2)(ii)	temperature monitoring and calibration of the chart recorder, data logger or temperature indicator
63.828(a)(4)(i)	temperature monitoring device requirements and location of the thermocouple or temperature sensor
63.828(a)(5)	capture system monitoring plan
63.828(b)	any excursion, unless otherwise excused, is considered a violation of the emission standard
63.829(b)(1)	monthly records of operating parameter data
63.829(b)(2)	records of each applicability determination
63.829(b)(3)	records for continuous monitoring system

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block 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.

(3) 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 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).

(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.

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart KK, including the following sections:

Section:	Requirement:
63.830(b)(5)	start-up, shutdown, and malfunction reports
63.830(b)(6)	semi-annual summary report.

(2) The permittee shall submit quarterly summaries of the following records:

a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

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. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s);

d. each incident of deviation described in “a” or ”b” (above) where a prompt investigation was not conducted;

e. 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

f. 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.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic HAP emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitations shall be demonstrated through performance tests of the capture efficiency and control

device efficiency and continuing compliance through continuous monitoring of the capture system and control device operating parameters. The permittee shall:

i. Monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(4) to assure control device efficiency, and

ii. For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(5) to assure capture efficiency, and

iii. Determine the organic HAP emission for those presses served by each capture system delivering emissions to that oxidizer by:

(a) Determining the oxidizer destruction efficiency (E) using the procedure in 40 CFR 63.827(d);

(b) Determining the capture system efficiency (F) in accordance with 40 CFR Part 63.827(e)-(f); and

(c) Calculating the overall organic HAP control efficiency, (R), using the following equation: $\mathrm{R} = \frac{(\mathrm{E})(\mathrm{F})}{100}$.

b. Emission Limitation:

For the natural gas fired oven, visible PE from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the allowable visible PE limitation above shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable PE limitation above shall be demonstrated by dividing the AP-42 emission factor 7.6 pounds of PE per million standard cubic feet (scf) of natural gas fire* by 1020 Btu per scf.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC rule 3745-17-03(B)(9).

*AP-42 emission factor from Table 1.4-2 dated 7/98.

d. Emission Limitation:

The emissions of VOC shall not exceed 7.83 pounds per hour for coatings.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the worst-case coating in pounds of VOC per gallon of coating by the maximum hourly usage rate in gallons times (1-0.95*).

*minimum overall control efficiency

e. Emission Limitation:

The emissions of VOC shall not exceed 34.3 tons per year for coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 3.a) of Section B – Facility-Wide Terms and conditions.

f. Emission Limitations:

The thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, and the capture equipment shall achieve a capture efficiency which is at least 95 percent, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control (destruction) efficiency and capture efficiency for VOC above shall be demonstrated based on the results of emissions testing conducted in accordance with f)(2) below.

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

a. The emission testing was conducted on March 16, 2011.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

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 OAC rule 3745-21-10. 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 test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

g) Miscellaneous Requirements

(1) None.

2. K006, SILKSCREEN

Operations, Property and/or Equipment Description:

Silk screen printing machine with 0.75 MM Btu/hour natural gas fired oven - Silkscreen.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	The emissions of volatile organic compounds (VOC) shall not exceed 15.4 pounds per hour for coatings and 67.5 tons per year for coatings and cleanup materials.
b.	OAC rule 3745-17-07(A)	For the natural gas fired oven, visible particulate emissions (PE) from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10	For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.
d.	OAC rule 3745-21-07(G)(2)	The permittee shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material. See b)(2)b.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation was established 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.

However, if any proposed change(s), such as with production capacity, line speeds, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a chapter 31 modification or an administrative modification to the permit to install prior to the change(s).

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)d., d)(1), e)(1), and f)(1)c.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and photochemically reactive cleanup material employed;

b. the number of gallons of each coating and photochemically reactive cleanup material employed;

c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and

f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).].

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

a. Emission Limitation:

For the natural gas fired oven, visible PE from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the allowable visible PE limitation above shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation:

For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable PE limitation above shall be demonstrated by dividing the AP-42 emission factor 7.6 pounds of PE per million standard cubic feet (scf) of natural gas fire* by 1020 Btu per scf.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC rule 3745-17-03(B)(9).

*AP-42 emission factor from Table 1.4-2 dated 7/98.

c. Emission Limitations:

The permittee shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.

Applicable Compliance Method:

Compliance with the hourly and daily allowable organic material emission limitations above shall be demonstrated based upon the record keeping requirements established in d)(1) above.

d. Emission Limitation:

The emissions of VOC shall not exceed 15.4 pounds per hour for coatings.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the worst-case coating in pounds of VOC per gallon of coating by the maximum hourly usage rate in gallons.

e. Emission Limitation:

The emissions of VOC shall not exceed 67.5 tons per year for coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 3.b) of Section B – Facility-Wide Terms and conditions.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Group 1: K001, K003, K004, K007,

EU ID	Operations, Property and/or Equipment Description
K001	Reverse roll coater with optional in-line rotogravure station and a 4.5 MM Btu/hour natural gas fired oven - 80 line coater.
K003	Reverse roll coater with optional in-line rotogravure station and a 6.0 MM Btu/hour natural gas fired oven - 100 line coater.
K004	Reverse roll coater with optional in-line rotogravure station and a 6.0 MM Btu/hour natural gas fired oven - 90 line coater.
K007	Reverse roll coater with optional in-line rotogravure station and an infrared oven - UV Coater.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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)	For emissions unit K001: The emissions of volatile organic compounds (VOC) shall not exceed 20.3 pounds per hour for coatings and 88.9 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K001 shall achieve a capture efficiency which is at least 98.2 percent, by weight, for VOC. For emissions unit K003: The emissions of VOC shall not exceed 16.25 pounds per hour for coatings and 71.2 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K003 shall achieve a capture efficiency which is at least 92.2 percent, by weight, for VOC. For emissions unit K004: The emissions

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		of VOC shall not exceed 24.53 pounds per hour for coatings and 107.4 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K004 shall achieve a capture efficiency which is at least 98.5 percent, by weight, for VOC. For emissions unit K001, K003, and K004, the thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC. For emissions unit K007: The emissions of VOC shall not exceed 2.5 pounds per hour for coatings and 11.0 tons per year for coatings and cleanup materials. For emissions unit K007, the thermal oxidizer and capture equipment shall achieve an overall control efficiency of at least 95 percent, by weight, for VOC. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart KK.
b.	OAC rule 3745-21-09(B)(6) (In lieu of complying with OAC rule 3745-21-09(F)(1) and (G))	The emission limitations required by this applicable rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-21-09(F)(2)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See c)(1) below.
d.	OAC rule 3745-21-09(H)	The emission limitations required by this applicable rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 60, Subpart FFF	For emissions units K003, K004, and K007, the emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The temperature sensor is located in the

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		combustion chamber at the exhaust outlet. This sensor location and monitoring, record keeping, and reporting requirements of 40 CFR Part 63, Subpart KK have been deemed to satisfy the monitoring, record keeping, and reporting requirements of 40 CFR Part 60, Subpart FFF.
f.	40 CFR Part 63, Subpart KK	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.823)	Table 1 to Subpart KK of Part 63 – Applicability of General Provisions to Subpart KK of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

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

However, if any proposed change(s), such as with production capacity, line speed, the types and/or quantities of materials used or processed, or anything else that increases the potential emission of any air pollutant for the emissions units listed above, then the permittee shall apply for and obtain either a chapter 31 modification or an administrative modification to the permit to install prior to the change(s).

c) Operational Restrictions

(1) Work practice standards for cleaning materials.

Unless emissions to the atmosphere are controlled by an approved emission control system with an overall control efficiency of at least ninety per cent, any person using an organic solvent for cleanup shall:

a. Store all VOC containing cleaning materials and used shop towels in closed containers;

b. Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials;

c. Minimize spills of VOC-containing cleaning materials;

d. Convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and

e. Minimize VOC emission from cleaning of storage, mixing, and conveying equipment.

d) Monitoring and/or Recordkeeping Requirements

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

Section:	Requirement:
63.828(a)(2)(ii)	temperature monitoring and calibration of the chart recorder, data logger or temperature indicator
63.828(a)(4)(i)	temperature monitoring device requirements and location of the thermocouple or temperature sensor
63.828(a)(5)	capture system monitoring plan
63.828(b)	any excursion, unless otherwise excused, is considered a violation of the emission standard
63.829(b)(1)	monthly records of operating parameter data
63.829(b)(2)	records of each applicability determination
63.829(b)(3)	records for continuous monitoring system

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block 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.

(3) 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 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).

(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.

e) Reporting Requirements

(1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart KK, including the following sections:

Section:	Requirement:
63.830(b)(5)	start-up, shutdown, and malfunction reports
63.830(b)(6)	semi-annual summary report

(2) The permittee shall submit quarterly summaries of the following records:

a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

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. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s);

d. each incident of deviation described in “a” or ”b” (above) where a prompt investigation was not conducted;

e. 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

f. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s).

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Organic HAP emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitations shall be demonstrated through performance tests of the capture efficiency and control device efficiency and continuing compliance through continuous monitoring of the capture system and control device operating parameters. The permittee shall:

i. Monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(4) to assure control device efficiency, and

ii. For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(5) to assure capture efficiency, and

iii. Determine the organic HAP emission for those presses served by each capture system delivering emissions to that oxidizer by:

(a) Determining the oxidizer destruction efficiency (E) using the procedure in 40 CFR 63.827(d);

(b) Determining the capture system efficiency (F) in accordance with 40 CFR Part 63.827(e)-(f); and

(c) Calculating the overall organic HAP control efficiency, (R), using the following equation: $R = \frac{(E)(F)}{100}$.

b. Emission Limitations:

For emissions unit K001: The emissions of VOC shall not exceed 20.3 pounds per hour for coatings.

For emissions unit K003: The emissions of VOC shall not exceed 16.25 pounds per hour for coatings.

For emissions unit K004: The emissions of VOC shall not exceed 24.53 pounds per hour for coatings.

For emissions unit K007: The emissions of VOC shall not exceed 2.5 pounds per hour for coatings.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the worst-case coating in pounds of VOC per gallon of coating by the maximum hourly usage rate in gallons times (1-0.95*).

*minimum overall control efficiency

c. Emission Limitation:

For emissions unit K001: The emissions of VOC shall not exceed 88.9 tons per year for coatings and cleanup materials.

For emissions unit K003: The emissions of VOC shall not exceed 71.2 tons per year for coatings and cleanup materials.

For emissions unit K004: The emissions of VOC shall not exceed 107.4 tons per year for coatings and cleanup materials.

For emissions unit K007: The emissions of VOC shall not exceed 11.0 tons per year for coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 3.a) of Section B – Facility-Wide Terms and conditions.

d. Emission Limitations:

The capture equipment for emissions unit K001 shall achieve a capture efficiency which is at least 98.2 percent, by weight, for VOC.

The capture equipment for emissions unit K003 shall achieve a capture efficiency which is at least 92.2 percent, by weight, for VOC.

The capture equipment for emissions unit K004 shall achieve a capture efficiency which is at least 98.5 percent, by weight, for VOC.

For emissions unit K001, K003, and K004, the thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC.

For emissions unit K007, the thermal oxidizer and capture equipment shall achieve an overall control efficiency of at least 95 percent, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control (destruction) efficiency, capture efficiency, and overall control efficiency for VOC above shall be demonstrated based on the results of emissions testing conducted in accordance with f)(2) below.

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

a. The emission testing shall be conducted within 3 months after issuance of this permit for emissions units K001 and K007.

b. The emission testing was conducted on March 16, 2011 for emissions units K003 and K004.

c. The emission testing shall be conducted to demonstrate compliance with the capture efficiency, control efficiency, and overall control efficiency limitations for VOC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA'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.)

e. 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 OAC rule 3745-21-10. 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.

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

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

g) Miscellaneous Requirements

(1) None.