



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/5/2011

MICHAEL MAGAR
MEDCO ADHESIVE COATED PRODUCTS CO.
5156 RICHMOND RD.
BEDFORD HEIGHTS, OH 44146

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318047372
Permit Number: P0107709
Permit Type: Renewal
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very 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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MEDCO ADHESIVE COATED PRODUCTS CO.**

Facility ID:	1318047372
Permit Number:	P0107709
Permit Type:	Renewal
Issued:	4/5/2011
Effective:	4/5/2011
Expiration:	4/5/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
MEDCO ADHESIVE COATED PRODUCTS CO.

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Authorization

Facility ID: 1318047372
Application Number(s): A0041370
Permit Number: P0107709
Permit Description: Renewal PTIO for Medco Coated Products knife-over-roll adhesive coated paper web with thermal oxidizer coating line K001. (PTI 13-1500 dated 5/7/1986 and PTO dated 5/7/1993)
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 4/5/2011
Effective Date: 4/5/2011
Expiration Date: 4/5/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MEDCO ADHESIVE COATED PRODUCTS CO.
5156 RICHMOND RD.
BEDFORD HEIGHTS, OH 44146

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

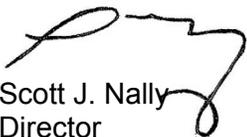
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107709
Permit Description: Renewal PTIO for Medco Coated Products knife-over-roll adhesive coated paper web with thermal oxidizer coating line K001. (PTI 13-1500 dated 5/7/1986 and PTO dated 5/7/1993)

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

Emissions Unit ID:	K001
Company Equipment ID:	Knife-Over-Roll Coater and Drying Oven
Superseded Permit Number:	13-1500
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

- **Annual emissions fee.** Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a



renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. K001, Knife-Over-Roll Coater and Drying Oven

Operations, Property and/or Equipment Description:

Adhesive coating operation with knife applicator and paper/fabric roll controlled with a thermal oxidizer with a 1200 degree Fahrenheit lower limit.

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

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

a. None.

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

a. 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. It lists OAC rules 3745-31-05(A)(3), 3745-21-09(B)(6), 3745-21-09(F) & (G), and 40 CFR 60 Subpart RR with their respective emission limits and control measures.



(2) Additional Terms and Conditions

a. The minimum operating temperature of the thermal oxidizer shall be 1200 degrees Fahrenheit as determined during a stack test conducted on Mar 12, 1987.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 60, Subpart RR:

Table with 2 columns: Applicable Rule, Requirement. Rows include 40 CFR Part 60.443 (d), (e), 40 CFR Part 60.445 (a), and (e).

(2) The permittee shall collect and record the following information each day for the control equipment and maintain the information at the facility for a period of three years:

- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature of the thermal oxidizer was more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
b. a log of the operating time for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

(3) The permittee shall collect and record the following information each month for this emissions unit for the purpose of determining percent VOC reduction:

- a. the name and identification number of each coating, as applied;
b. the VOC content of each coating, as applied, in pounds per gallon;
c. the number of gallons of each coating employed;
d. the uncontrolled VOC emissions from all coatings applied, i.e., the summation of the products of "b" x "c";
e. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance;



- f. the total controlled VOC emissions from all coatings applied, i.e., "d" x "e";
g. the name and identification of each cleanup material employed;
h. the VOC content of each cleanup material, in pounds per gallon;
i. the number of gallons of each cleanup material employed;
j. the total VOC emissions from all cleanup materials employed, i.e., the summation of the products of "h" x "i", in pounds; and
k. the total VOC emissions from all coatings and cleanup materials employed during the day, i.e., "f" + "j", in pounds.

e) Reporting Requirements

- (1) The permittee shall comply with the following applicable reporting requirements identified in 40 CFR Part 60, Subpart RR:

Table with 2 columns: Applicable Rule, Requirement. Rows include 40 CFR Part 60.447 (b) and 40 CFR Part 60.447 (c).

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit.

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 method(s):

a. Emission Limitation:

VOC stack emissions shall not exceed 0.2 kg/kg solids applied as a weighted monthly average.

Applicable Compliance Method:

If choosing this emission limitation, compliance shall be determined in accordance with the following formula as detailed in 40 CFR 60.443(a)(2) on a monthly basis:

$G = \sum (W_{oi} M_{ci} / W_{si} M_{ci})$, where:

W_{oi} = weight fraction of organics applied of each coating

M_{ci} = mass of coating applied as determined from facility records

W_{si} = weight fraction of solids applied of each coating

G = calculated weighted average mass of VOC per mass of coating solids applied

b. Capture and Control Limitations

90% overall reduction of stack and fugitive VOCs for all inks and coatings over a calendar month.

Applicable Compliance Method:

Compliance may be determined using the formula below as detailed in 40 CFR 60.443(b):

$$R_q = (G - 0.2/G) \times 100$$

R_q = the required overall VOC emission reduction in percent

If R_q is less than or equal to 90 percent, then the required overall VOC emission reduction is R_q . If R_q is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

If required, compliance shall be determined using 40 CFR Part 60, Appendix A, Methods 1 – 4, 25 or 25A (as noted below), and 40 CFR Part 51, Appendix M, Method 204 (as noted below). Performance testing shall be done in accordance with OAC rule 3745-21-10(C) and 40 CFR 60.444 and 60.446.

- (2) Per OAC rule 3745-21-04 (B)(1) and (B)(5) US EPA Method 24 or 24 (a) shall be used to determine the VOC contents of all inks and coatings employed in this emissions unit. Cleanup use Method 24 or formulation data.
- (3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emissions testing shall be conducted within six months after issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall VOC destruction limit of 90%. The emission testing shall also be conducted to establish the minimum combustion temperature of the thermal oxidizer.
 - c. The following test methods shall be employed to demonstrate compliance with the VOC reduction emission limitations:

- i. Method 25 at inlet to thermal incinerator.
- ii. Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm, or Method 25 A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and
- iii. Method 204 of 40 CFR Part 51, Appendix M, to determine capture efficiency.
- iv. Method 24 or 24 (a) of 40 CFR 60, Appendix A, to determine VOC contents of coatings and cleanup materials.

Alternative US EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. Testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality (Cleveland DAQ).
- e. 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 "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request for the use of an alternative method, including an evaluation of the applicability, necessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirements.)
- f. The control or destruction efficiency, defined as the percent reduction of 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 a consideration of the potential presence of interfering gases.

Not later than 30 days prior to proposed test date(s), the permittee shall submit an "Intent to Test" notification that shall describe in detail the proposed test methods and procedures, the emissions the emission unit operating parameters, the time(s) and dates(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 Cleveland DAQs refusal to accept the results of the emission test(s).

Personnel from the Cleveland DAQ 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 emission unit and the testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.

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 Cleveland DAQ 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 Cleveland DAQ.

- g) Miscellaneous Requirements
 - (1) none