



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
LAKE COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.  
Center

**Application No: 02-17482**

**DATE: 2/3/2004**

Avery Dennison Corp., Graphics Division  
Kevin Cherney  
250 Chester St  
Painesville, OH 44077

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

NEDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 2/3/2004  
Effective Date: 2/3/2004**

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-17482**

Application Number: 02-17482  
APS Premise Number: 0243001188  
Permit Fee: **\$100**  
Name of Facility: Avery Dennison Corp., Graphics Division  
Person to Contact: Kevin Cherney  
Address: 250 Chester St  
Painesville, OH 44077

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**670 Hardy Rd., Building 11  
Painesville, Ohio**

Description of proposed emissions unit(s):  
**Administrative Modification to Permit to Install 02-17482, issued on Oct. 28, 2003 to eliminate a less stringent requirement.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, 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:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## 2. Scheduled Maintenance/Malfunction Reporting

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

## 3. Risk Management Plans

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

## 4. Title IV Provisions

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

## 5. Severability Clause

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

declared invalid.

## **6. General Requirements**

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

## **7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are

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

## 9. Compliance Requirements

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

**10. Permit To Operate Application**

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

**11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**12. 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.

## **B. State Only Enforceable Permit To Install General Terms and Conditions**

### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### **2. 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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Permit Transfers**

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

### **4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. 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.

## **5. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

## **6. 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.

## **7. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**8. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	95.33

Avery Dennison Corp., Graphics Division

PTI Application: **02-17482**

**Modification Issued: 2/3/2004**

Facility ID: **0243001188**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None



**Modification Issued: 2/3/2004**Applicable Emissions  
Limitations/Control  
Measures

22.03 pounds VOC per hour from the coating line, including cleanup, as a daily average (0.3 pounds/hr from the print station, including cleanup)

95.33 tons VOC per year from both the coating line and the printing station, including cleanup

The thermal oxidizer shall achieve a 98.3 % overall VOC reduction by weight (with a 100% capture efficiency and at least a 98.3% destruction efficiency) for all solvent based coatings.

See A.I.2.a, A.I.2.b, and A.I.2.c.

The requirements of this rule also include compliance with 40 CFR Part 60, Subpart RR. for the adhesive coating operation and OAC rule 3745-21-09(Y)(1) for the print station.

For all coatings and inks, employed in the printing station of this emissions unit, the volatile organic compound content limit specified by this rule is less stringent than the limitation established pursuant to 40 CFR Part 60 Subpart RR.

The requirements specified in these rules are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3). The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3).

For the coatings that are not vented to the thermal oxidizer (non-solvent based coatings), the VOC content of the coatings employed shall not exceed 0.20 kg VOC/kg of coating solids.

See A.I.2.b.

Exempt by 40 CFR Subpart KK, Section 63.821(a)(2)(ii)(A). See Part A.II.9. of the terms and conditions of this permit.

See A.I.2.d, A.II.10, and A.II.11.

**Modification Issued: 2/3/2004****2. Additional Terms and Conditions**

**2.a** The permanent total enclosure for this emissions unit, shall comply with the requirements of 40 CFR Part , 51, Appendix M, Reference Method 204, to capture all VOC emissions from the adhesive coater.

**2.b** All solvent based coatings from the adhesive coating operation must be vented to the thermal oxidizer. A solvent based coating is any coating that has a VOC content greater than 0.2 kgVOC per kg coating solids, as applied.

All inks and coatings employed in the print station of this emissions unit shall be "non solvent based coatings", i.e, they shall have a VOC content less than or equal to 0.2 kg VOC per kg of coating solids, as applied.

**2.c** For the adhesive coatings that are vented to the thermal oxidizer in lieu of complying with the pounds of VOC per gallon of solids limitation contained in OAC rule 3745-21-09(F), the permittee shall comply with the capture and control requirements which are more stringent than those required by OAC rule 3745-21-09(B)(6), and are established as BAT by OAC rule 3745-31-05(A)(3) above.

**2.d** Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR 63.3330, the source must limit HAP emissions from the affected source to:

- i. No more than 5 percent of the organic HAP applied for each month (95 percent reduction); or
- ii. No more than 4 percent of the mass of coating materials applied for each month; or
- iii. No more than 20 percent of the mass of coating solids applied for each month.

The permittee shall operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 ppmv by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

**II. Operational Restrictions**

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation and employing solvent based coatings, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated this emissions unit was in compliance.

**Modif**

Emissions Unit ID: K003

2. When employing solvent based coatings, the adhesive coating line shall be totally enclosed such that all the VOC emissions are captured. Compliance with the following criteria for a Permanent Total Enclosure (PTE), identified by USEPA Method 204, shall be met by the permittee to demonstrate 100 % capture efficiency (CE):
  - a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Director or Administrator.
  - b. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
  - c. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.
  - d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.
  - e. All VOC emissions from the adhesive coating operation, except those resulting from non-solvent based coatings, must be captured and vented to the thermal oxidizer.
3. When this emissions unit is in operation, and employing solvent based coatings and cleanup materials, the PTE shall be maintained under negative pressure at a minimum differential pressure, in inches of water as a three-hour average, that is equal to or greater than the differential pressure that was established at the time of the last emissions test that demonstrated compliance with the criteria for the permanent total enclosure. The corresponding differential pressure shall be determined for the PTE when compliance with the 200 fpm facial velocity is demonstrated.
4. This emissions unit shall be vented to the thermal oxidizer during all solvent based coating operations and shall not vent through any bypass stack except when employing only non-solvent based coatings.
5. The permittee shall properly maintain and operate the LEL units in the bypass stack, or any other devices or means, to ensure that emissions from solvent based coatings do not go directly to the ambient air.
6. During the required use of the thermal oxidizer, the permittee shall ensure that any inline bypass that could divert solvent laden air from any coating applicator to the ambient air is closed.

In addition, any device in the bypass which indicates a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.
7. The thermal oxidizer control system shall be designed and operated according to good engineering practices and the manufacturer's specifications.

**Modification Issued: 2/3/2004**

8. The concentrations of VOC emissions measured in accordance with the leak monitoring program for the permanent total enclosure shall not exceed 100 ppm, by volume.
9. The permittee shall operate this emissions unit such that during each month the sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the printing operation using product and packaging rotogravure work stations or wide web flexographic presses, never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied at all coating stations in the emissions unit in that month, including all inboard and outboard stations, as described in Section 63.821(A).

In the event that the percentage of the total mass as described above is in excess of 5%, this coating line shall no longer be exempted from 40 CFR Part 63, Subpart KK.

10. Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR 63.3330, the affected source must comply with the following operating limit:

The average combustion temperature within the thermal oxidizer serving this emissions unit (thermal oxidizer 3) in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3360(e)(3)(i).

11. Pursuant to 40 CFR 63.6(e), the owner or operator of an affected source must develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; a program of corrective action for malfunctioning process; and air pollution control and monitoring equipment used to comply with the relevant standard. This plan must be developed by the owner or operator by the source's compliance date for that relevant standard. The purpose of the startup, shutdown, and malfunction plan is listed below:
  - a. ensure that, at all times, the owner or operator operate and maintain affected sources, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by the relevant standards;
  - b. ensure that owners or operators are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants; and
  - c. reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution

control equipment to its normal or usual manner of operation).

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperatures within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation and employing solvent based coatings, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emission unit was in compliance.
  - b. A log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation and employing solvent based coatings.
  - c. A record of all periods of time during which solvent based coatings were employed, but the VOC emissions were not vented to the thermal oxidizer.
  - d. A record of all periods of time during which solvent based coatings (inks) were employed in the print station of this emissions unit.
2. By November 29, 2003, [within 18 months after the issuance of the Title V permit (5/29/02)], the permittee shall install, and thereafter operate and maintain, a continuous pressure drop monitor and recorder which measures and records the pressure drop across the total enclosure, serving the adhesive coating operations, when the permittee is employing solvent based coatings in this emissions unit. Units shall be in inches of water. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The pressure drop monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day, when this emissions unit is in operation and employing solvent based coatings and cleanup materials:

- a. all three hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential, in inches of water as a three-hour average, specified in A.II.3; and
- b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

**Modif**

Emissions Unit ID: K003

3. Prior to the installation of the monitoring and recording equipment for pressure drop, and when this emissions unit is in operation and employing solvent based coatings and cleanup materials, each day the permittee shall inspect the permanent total enclosure to ensure that the following conditions are being maintained:
  - a. all access doors and windows that are not natural draft openings are closed;
  - b. all velcro closures, (if employed) are intact; and
  - c. the direction of air is inward as shown by streamers, smoke tubes, or tracer gases and/or by ensuring that all component curtains curve inward.

The permittee shall also perform weekly velocity or pressure drop measurements for the permanent total enclosure to ensure that the ventilation rate through all natural draft openings is maintained at 200 feet per minute or greater when this emissions unit is in operation and employing solvent based coatings and cleanup materials.

Records shall be kept of each daily inspection and the weekly velocity or pressure drop measurements, and shall include any corrective actions taken by the permittee.

4. The permittee shall collect and record the following information monthly for all coatings and inks employed in this emissions unit that are not vented to the thermal oxidizer:
  - a. the name and identification number of each coating or ink employed;
  - b. the VOC content of each coating or ink, in kg/kg of coating solids, as applied;
  - c. the weight fraction of VOC in each coating or ink;
  - d. the weight fraction of solids in each coating or ink;

**Modification Issued: 2/3/2004**

- e. the total mass of each coating or ink, in kgs; and
- f. the mass-weighted average VOC content for all the coatings and the mass weighted average for all inks employed, in kg/kg of coating solids, calculated in accordance with the equation in section 60.443(a)(2) of Subpart RR.

If the VOC content of each coating and each ink employed during the calendar month does not exceed 0.20 kg of VOC/kg of solids, the permittee has demonstrated compliance with the VOC content limitation for that month and is not required to calculate the mass-weighted VOC content for all the coatings employed during the calendar month.

- 5. The permittee shall collect and record the following information daily for all adhesive coatings employed in this emissions unit that are vented to the thermal oxidizer and the cleanup materials associated with those coatings:
  - a. The name and identification number of each coating, as applied;
  - b. The number of gallons of each coating, excluding water and exempt solvents;
  - c. The VOC content of each coating, excluding water and exempt solvents, as applied, in pounds per gallon;
  - d. The name and identification of each cleanup material employed;
  - e. The number of gallons of each cleanup material employed;
  - f. The VOC content of each cleanup material, in pounds per gallon;
  - g. The total uncontrolled VOC emissions from all coatings, in tons;
  - h. The total uncontrolled VOC emissions from all cleanup materials, in tons;
  - i. The calculated, controlled VOC emission rate for all coatings, in tons (the controlled VOC emission rate for the coatings shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
  - j. The total VOC emission rate, i.e., controlled VOC emissions from all coatings plus uncontrolled emissions from all cleanup materials, in tons.

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Avery  
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Emissions Unit ID: K003

**Modification Issued: 2/3/2004**

6. The permittee shall collect and record the following information daily for all the adhesive operation coatings employed in this emissions unit that are not vented to the thermal oxidizer:
  - a. the name and identification number of each coating employed;

**Modif**

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- b. the VOC content of each coating, as employed, excluding water and exempt solvents, in lbs per gallon;
  - c. the number of gallons of each coating employed, excluding water and exempt solvents;
  - d. the name and identification of each cleanup material employed;
  - e. the number of gallons of each cleanup material employed;
  - f. the VOC content of each cleanup material, in pounds per gallon;
  - g. the total VOC emissions from all coatings employed, in tons and from all coatings and cleanup materials employed, in tons; and
  - h. the daily volume-weighted average VOC content, in pounds per gallon of all the coatings employed, excluding water and exempt solvents, calculated in accordance with the equation in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{voc,2}$ .
7. The permittee shall collect and record monthly the following information for all coatings and all cleanup materials employed in this emissions unit:
  - a. the cumulative monthly sum of the daily values from A.III.11.d; and
  - b. the cumulative, year-to-date, VOC emissions for the calendar year, in tons.
8. The permittee shall inspect and monitor at least quarterly with a Photoionization Detector or equivalent device all positive pressure locations between the permanent total enclosure of the coater and the thermal oxidizer for unacceptable VOC emissions (greater than 100 ppm) and maintain records of the results in accordance with the permittee's 1998 preventive maintenance plan or equivalent. Records shall be maintained of each inspection and monitoring and shall include the following:
  - a. line speed;
  - b. fan speed;
  - c. VOC content of the coating applied at the time of monitoring; and
  - d. an indication of any unacceptable VOCs.
9. The permittee shall maintain records of the maintenance and operation of the LEL units, or any other device or means approved by the Ohio EPA, which ensure that the emissions from solvent based coatings do not go directly to the ambient air, and these records shall be made available to the Director or his representative upon request during normal business hours.

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The permittee shall record the date and duration of each period of bypassing while employing solvent based coatings.

10. Any device in the bypass that monitors a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.
11. The permittee shall record the following information daily:
  - a. the total VOC emissions from this emissions unit, i.e., the sum of the values from A.III.5.i, A.III.6.g, A.III.12.b in pounds; (for all coatings, inks and cleanup materials);
  - b. the total operating hours for the emissions unit;
  - c. the average hourly emission rate, in pounds per hour (a/b); and
  - d. the summation of VOC emissions for the calendar year from all coatings and cleanup materials, in tons.
12. Per OAC rule 3745-21-09(Y), the permittee shall collect and record daily the following information for each coating and ink from the flexography print station employed in this emissions unit:
  - a. the name and identification number of each coating and ink applied;
  - b. the total VOC emissions from all inks and cleanup materials employed in this emissions unit, in pounds.
13. The permittee shall maintain records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f).  
In order to qualify for the exemption from the MACT requirements as described in 63.821(a)(2)(ii)(A), the permittee shall maintain the following records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f)(1) and (f)(2) for five years and submit them to the Director upon request:
  - a. the total mass of all materials, including inks, coatings, varnishes, adhesives, primers, solvents, thinners, and reducers, applied at product and packaging rotogravure stations and wide web flexographic stations in each month, including all inboard and outboard stations; and

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- b. the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers applied at all coating stations in the emissions unit each month;
  - c. the ratio of total mass of all materials applied by the printing operation using product and packaging rotogravure stations and wide web flexographic presses compared to the total mass of all materials used in the emissions unit, i.e.,  $a/b \times 100\%$ ; and
  - d. confirmation that all coaters are stand alone equipment as defined in the rule.
14. On and after the compliance date specified in 40 CFR Section 63.3330, each owner or operator of an affected source subject to 40 CFR 63.3320 must maintain the records specified in paragraphs (a)(1) and (2) of 40 CFR 63.3410 on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1):
- a. Records specified in Sec. 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, including if applicable:
    - i. Continuous emission monitor data in accordance with the requirements of Sec. 63.3350(d);
    - ii. Control device and capture system operating parameter data in accordance with the requirements of Sec. 63.3350(c), (e), and (f);
    - iii. Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(c);
    - iv. Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(d);
    - v. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of Sec. 63.3360(e) and (f); and
    - vi. Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of Sec. 63.3370(b), (c), and (d).
  - b. Records specified in Sec. 63.10(c) for each CMS operated by the owner or operator in accordance with the requirements of Sec. 63.3350(b).
15. Pursuant to 40 CFR 63.3350(c) and upon the compliance date, web coating lines with intermittently-controlled work stations shall be monitored for bypasses of the control device and the mass of each coating material applied at the work station during any such bypass. If using a control device for complying with the requirements of this subpart, you must demonstrate that any coating material applied on a never- controlled work station or an intermittently-controlled work station operated in bypass mode is allowed in your compliance demonstration according to Sec.

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63.3370(n) and (o). The bypass monitoring must be conducted using at least one of the procedures in paragraphs (c)(1) through (4) of 40 CFR 63.3350(c) for each work station and associated dryer. The procedures are the following:

- a. Flow control position indicator.
- b. Car-seal or lock-and-key valve closures.

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- c. Valve closure continuous monitoring.
  - d. Automatic shutdown system.
16. When using a control device to comply with the emission standards in 40 CFR 63.3320, the permittee shall install, operate, and maintain each CPMS specified in paragraphs (e)(9) and (10) and (f) of 40 CFR 63.3350 according to the requirements in paragraphs (e)(1) through (8) of 40 CFR 63.3350 . You must install, operate, and maintain each CPMS specified in paragraph (c) of 40 CFR 63.3350 according to paragraphs (e)(5) through (7) of 40 CFR 63.3350. Paragraphs (e)(1) through (e)(8) are listed below as terms (a) through (h):
- a. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. and a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.
  - b. The permittee shall have valid data from at least 90 percent of the hours during which the process operated.
  - c. The permittee shall determine the hourly average of all recorded readings according to paragraphs (16)(c)(i) and (ii) of 40 CFR Section 63.3350.
    - i. To calculate a valid hourly value, the permittee must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.
    - ii. Provided all of the readings recorded in accordance with paragraph (e)(3) of 40 CFR Section 63.3350 clearly demonstrate continuous compliance with the standard that applies, then the permittee is not required to determine the hourly average of all recorded readings.
  - d. The permittee shall determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).
  - e. The permittee shall record the results of each inspection, calibration, and validation check of the CPMS.
  - f. At all times, the permittee shall maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

- g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), the permittee shall conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in Sec. 63.3370. All the valid data collected during all other periods in assessing compliance of the control device and associated control system shall be used. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- h. Any averaging period for which the permittee does not have valid monitoring data and such data is required constitutes a deviation, and you must notify the Administrator in accordance with Sec. 63.3400(c).

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer did not comply with the temperature limitation specified above.
  - b. All periods when the stack that bypasses the thermal oxidizer was used while employing solvent based coatings in the emissions unit.
2. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any monthly record showing that the mass-weighted average VOC content for the non-solvent based coatings and inks employed exceeded the applicable limitation of 0.20 kg of VOC per kg of coating solids, as applied.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 45 days after the exceedances occurred.
3. Beginning with the first calendar quarter following the installation of the pressure drop monitoring equipment for the PTE, the permittee shall submit quarterly deviation (excursion) reports that identify all three-hour blocks of time, when the emissions unit was in solvent based operation, during which the permanent total enclosure was not maintained at the minimum pressure differential required in A.II.3.
4. The permittee shall submit quarterly summaries of the daily inspections and weekly velocity or pressure drop measurements for the permanent total enclosure. The summaries shall identify the days when the permanent total enclosure was not functioning properly, the cause(s) for the improper operation, and the corrective actions taken. The quarterly summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

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- calendar quarters.
5. The permittee shall submit deviation(excursion) reports that identify each day during which the average hourly VOC emissions exceeded 22.03 pounds per hour, and the actual average hourly VOC emissions for each such day.
  6. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year.
  7. On or before December 5, 2004, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report:
    - a. the name and mailing address of the permittee;
    - b. the physical location of the source, if it is different from the mailing address;
    - c. identification of the relevant MACT standards and the permittee's compliance date;
    - d. a brief description of the nature, design, size, and method of operation of the source, and an identification of each emission point of each hazardous air pollutant; and
    - e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
  8. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR Part 63 Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:
    - a. the methods used to determine compliance;
    - b. the results of any performance test, opacity or visible emissions observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
    - c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
    - d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63

Subpart JJJJ;

- e. an analysis demonstrating whether the affected source is a major source or an area source;
- f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
- g. a statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63 Subpart JJJJ.

The facility shall submit semi-annual compliance reports as required by 40 CFR Part 63, Subpart JJJJ in accordance with the requirements of 40 CFR 63.3400(c)(1) & (2).

- 9. The permittee shall submit quarterly deviation reports that identify all exceedances of the 100 ppm, by volume, VOC concentration limitation specified in A.II.8.
- 10. The permittee shall submit deviation (excursion) reports that identify all exceedances of the 5% limit (the ratio of total mass of all materials applied on the product and packaging rotogravure work stations and wide web flexographic work stations to the total mass of all materials applied in the emissions unit), which exempts this printing operation from the requirements of the MACT standard as described in 40 CFR Part 63, Subpart KK, Section 63.821(a)(2)(ii)(A).

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

- 11. Pursuant to 40 CFR 63.3400 (c) and upon the compliance date in 40 CFR Part 63.3330, the permittee shall submit a semiannual compliance report according to paragraphs (c)(1) and (2) of 40 CFR 63.3400.

## V. Testing Requirements

- 1. USEPA Method 24 or Method 24A shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine the VOC contents for all coatings, cleanup materials and inks. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating, cleanup material or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.
- 2. Emission Limitation

98.3% overall VOC reduction by weight (with a 100% capture efficiency and a minimum 98.3% destruction efficiency) for all coatings except non-solvent based coatings.

#### Applicable Compliance Method

Performance testing shall be conducted within 3 months of the installation of the pressure drop equipment for the PTE, using the following methods:

40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M, Method 204.

Performance testing shall be in accordance with OAC rule 3745-21-10(C).

#### 3. Emission Limitation

0.20 kilogram of VOC per kilogram of solids, as applied, when not using the thermal oxidizer

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## Applicable Compliance Method

Compliance shall be based upon the use of Method 24, or any alternative compliance method approved by the USEPA for determining the VOC content of each coating, and on the record keeping requirements in Section A.III.4. of these terms and conditions.

## 4. Emission Limitation:

22.03 lbs VOC/hr on a daily average basis

Applicable Compliance Method: Compliance shall be based on the record keeping requirements in Section A.III. 5, 6, and 11 of these terms and conditions.

## 5. Emission Limitation

95.33 tons of VOC per year

## Applicable Compliance Method

Compliance shall be determined by the sum of the values for the calendar year based on the record keeping requirements in Section A.III.5, 6, 7 and 11 of these terms and conditions.

## 6. Pursuant to 40 CFR 63.3320 and on the compliance date specified 40 CFR 63.3330, the source must limit HAP emissions to:

- a. No more than 5 percent of the organic HAP applied for each month (95 percent reduction); or
- b. No more than 4 percent of the mass of coating materials applied for each month; or
- c. No more than 20 percent of the mass of coating solids applied for each month.

## Applicable Compliance Method:

Compliance with these limits will be demonstrated by demonstrating compliance with the limits in 40 CFR Part 60 Subpart RR and by demonstrating compliance with control efficiency established by OAC rule 3745-31-05(a)(3). These demonstrations will be made through recordkeeping and reporting as specified in Testing Requirements section for this unit.

To demonstrate compliance through performance tests of capture efficiency and control device efficiency, continuous monitoring of capture system, and CPMS for control device operating parameters for each oxidizer used to control emissions from one or more web coating lines the

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following shall be applied:

- a. Monitor the operating parameter in accordance with 40 CFR 63.3350(e) to ensure control device efficiency; and
- b. For each capture system delivering emissions to that oxidizer, monitor the operating parameter established in accordance with 40 CFR 63.3350(f) to ensure capture efficiency; and
- c. Determine the organic HAP emissions for those web coating lines served by each capture system delivering emissions to that oxidizer either:
  - i. In accordance with paragraphs (k)(1)(i) through (vi) of 40 CFR 63.3370, if the web coating lines served by that capture and control system have only always-controlled work stations; or
  - ii. In accordance with paragraphs (k)(1)(i) through (iii), (v), and (o) of 40 CFR 63.3370, if the web coating lines served by that capture and control system have one or more never-controlled or intermittently- controlled work stations.

7. Emission testing requirements

- a. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - i. The emission testing was conducted on October 11, 2002 and shall be conducted again as required in the most recently issued Title V permit.
  - ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation and destruction efficiency limitation for VOC of 98.3% and 98.3%, respectively.
  - iii. The following test methods shall be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC:

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 25A of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are less than 50ppm; and

Method 204 of 40 CFR Part 51 Appendix M.

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

- iv. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

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- b After March 2003, the capture efficiency shall be determined using Methods 204 through Method 204F, as specified 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 requirement.)

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 Ohio Administrative Code 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.

- c Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA and the 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 refusal to accept the results of the emission test(s).

Personnel from the Northeast District Office of the Ohio EPA 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.

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 Northeast District Office of the Ohio EPA 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 Northeast District Office of the Ohio EPA.

Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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**VI. Miscellaneous Requirements**

None

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>

**2. Additional Terms and Conditions****2.a****II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None