State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL** **CERTIFIED MAIL**
**LAKE COUNTY**

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

**Application No:** 02-18178

**DATE:** 4/15/2004

Avery Dennison, Cleveland Films Facility
Jeff Lyden
5750 Heisely Rd
Mentor, OH 44060

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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

You are hereby notified that this action 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**

**FINAL PERMIT TO INSTALL 02-18178**

| | |
|---|---|
| Application Number: | 02-18178 |
| APS Premise Number: | 0243081207 |
| Permit Fee: | **$800** |
| Name of Facility: | Avery Dennison, Cleveland Films Facility |
| Person to Contact: | Jeff Lyden |
| Address: | 5750 Heisely Rd<br>Mentor, OH 44060 |

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5750 Heisely Road**
**Mentor, Ohio**

Description of proposed emissions unit(s):
**Paper and film coating line.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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

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.

### 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**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

| Pollutant | Tons Per Year |
|---|---|
| VOC | 121 TPY |
| CO | 5.2 TPY |
| NOx | 6.2 TPY |

**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

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

**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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | |
|---|---|---|
| K003 - Coating Line CF-3 - paper, film, and other web substrate roll coating line with drying oven, wind and unwind station, and web treatment to coat 100% solid silicones and emulsion topcoats | OAC rule 3745-31-05(A)(3) | 40 CFR Part 63, Subpart JJJJ |
| | OAC rule 3745-21-09(F) | |
| | 40 CFR, Part 60, Subpart RR | |

| Applicable Emissions Limitations/Control Measures | |
|---|---|
| 27.6 pounds Volatile organic compounds (VOC) per hour from the coating line, including cleanup, as a daily average; 121 tons per year of VOC | The permittee shall not discharge organic HAP emissions into the atmosphere of more than 1.6 percent of the mass of coating applied or more than 8 percent of the mass of coating solids applied calculated for each month. |
| 1.40 pounds per hour and 6.2 tons per year of Nitrogen oxides ($NO_X$) emissions from the ovens and web treater.(See Section A.II.1.) | |
| 1.20 pounds per hour and 5.2 tons per year of Carbon monoxide (CO emissions)from the ovens and web treater. | |
| See A.I.2.a and A.I.2.b | |
| The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to 40 CFR Part60, Subpart RR. | |
| The permittee shall not discharge VOC emissions into the atmosphere of more than 0.20 kg VOC/kg of coating solids applied, calculated as a mass-weighted average for each month. | |

**2. Additional Terms and Conditions**

**2.a** Only coatings with a maximum VOC content of 0.54 pound per gallon of coating shall be used in this emissions unit.

**2.b** Silicone and top coat coatings shall not be applied concurrently.

## II. Operational Restrictions

1. The permittee shall use low NOx burners in the ovens at all times when this emissions unit is in operation.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:

   a. The name and identification number of each coating and cleanup material employed;

   b. The VOC content of each coating and cleanup material in pounds per gallon, as applied;

   c. The amount of each coating and cleanup material employed, in gallons per day;

   d. The total VOC emissions from all coatings and cleanup materials, in pounds and tons per day;

   e. The total annual VOC emissions from all coatings and cleanup materials to date, in tons;

   f. The total number of hours the emissions unit was in operation; and

   g. The daily average hourly VOC emission rate from all coatings and cleanup materials employed, i.e., (d)/(e), in pounds per hour (daily average).

2. The permittee shall collect and record the following information each month for this emissions unit:

   a. The name and identification number of each coating employed;

   b. The weighted average of the mass of solvent (VOC) used per mass of coating solids applied, in kg VOC/kg coating solids applied, calculated in accordance with the equation

in section 60.443(a)(2) of 40 CFR 60, Subpart RR, and as follows:

i. The weight fraction of volatile organic compounds and the weight fraction coating solids of each coating applied shall be determined by 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA.

ii. The weighted average shall be calculated using the following equation:

$G = (TWM_O) / (TWM_S)$

Where

$TWM_O$ = the sum, from i = 1 to i = n, of $(W_{oi} \times M_{ci})_i$

$TWM_s$ = the sum, from i = 1 to i = n, of $(W_{si} \times M_{ci})_i$

i = subscript denoting an individual coating

n = the number of different coatings employed

$M_{ci}$ = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records

$W_{oi}$ = the weight fraction of volatile organic compounds of each coating (i) applied during the calendar month as determined by Reference Method 24 or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data.

$W_{si}$ = the weight fraction of coating solids of each coating (i) applied during the calendar month as determined by Reference Method 24 or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data.

3. The permittee shall collect and record the following information each month for this emissions unit:

a. The name and identification number of each coating employed;

b. The average of the mass of HAP emissions per mass of coating solids applied, in kg HAP/kg coating solids applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR 63, Subpart JJJJ, and as follows:

i. If required, the weight fraction of HAP and the weight fraction coating solids of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311, 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA.

ii. The average shall be calculated using the following equation:

Where:

Hs = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied.

p = Number of different coating materials applied in a month.

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.

Mi = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §§ 63.3370.

Csi = Coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

Csij = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass-fraction, kg/kg.

c. The average of the mass of HAP emissions per mass of coating applied, in kg HAP/kg coating solids applied, calculated in accordance with the equations in section 63.3370(c)(4) of 40 CFR 63, Subpart JJJJ, and as follows:

i. If required, the weight fraction of HAP and the weight fraction coating of each coating applied shall be determined by 40 CFR Part 63, Appendix A, Reference Method 311, 40 CFR Part 60, Appendix A, Reference Method 24, or other test method approved by U.S. EPA, or by the coating manufacturer's formulation data, if approved by U.S. EPA.

ii. The average shall be calculated using the following equation:

Where:

HL = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg.

p = Number of different coating materials applied in a month.

Chi = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.

Mi = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

Chij = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

Mij = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

Mvret = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §§ 63.3370.

## IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information for this emissions unit:

   a. An identification of each day during which any noncomplying coatings where the VOC content exceeded 0.54 pound of VOC per gallon of coating were employed, and the actual VOC content in pounds of VOC per gallon of coating, for each such coating.

   b. An identification of each day during which the average hourly VOC emissions exceeded 27.6 pounds per hour, and the actual average hourly VOC emissions, for each such day.

   c. An identification of any record indicating that the annual VOC emissions exceeded 121 tons per year, and the actual annual VOC emissions.

   d. An identification of each month during which the mass-weighted average VOC emissions from coatings exceed 0.20 kg VOC/kg of coating solids applied, and the actual mass-weighted average VOC emissions from coatings in kg VOC/kg of coating solids applied, for each such month.

   e. An identification of each month during which the average HAP emissions from coatings exceed 8 percent of the mass of coating solids applied as described in the equation in Section AIII.3(b)(ii) of the terms and conditions of this permit, and 1.6 percent of the mass of coatings, applied as described the equation in Section AIII.3(c)(ii) of the terms and conditions of this permit from coatings in kg HAP/kg of coating solids applied, for

each such month.

2. Within 60 days after startup of this emissions unit, the permittee shall submit to the Ohio EPA a Notification of Compliance Status, signed by the responsible official who shall certify its accuracy, attesting to whether the emissions unit has complied with the relevant standard. The notification shall list:

   a. The methods that were used to determine compliance;

   b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedure or methods that were conducted;

   c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

   d. The type and quantity of Hazardous Air Pollutant(s) [HAP(s)] emitted by the emissions unit, reported in units and averaging times and in accordance with the test methods specified in 40 CFR 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 HAP and the control efficiency (percent) for each control device (or method); and

   g. A statement by the owner or operator of this affected source of whether the emissions unit has complied with the requirements of 40 CFR Part 63, Subpart JJJJ.

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

## V. Testing Requirements

1. Compliance with the emissions limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation

0.54 pounds of VOC per gallon of coating, as applied

Applicable Compliance Method
Compliance shall be determined based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. In accordance with OAC rule 3745-21-04 (B)(5), USEPA Method 24 shall be used to determine the VOC content of the coatings. In accordance with the USEPA's written approval of February 11, 1998, GCMS, Capillary Column Technique Method 8260A may be used to determine the VOC content of the water-based coatings, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A.

b. Emission Limitation:

27.6 lbs VOC/hr on a daily average basis and 121 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in Section A.III.1 of these terms and conditions.

c. Emission Limitation

The permittee shall not discharge into the atmosphere emissions of more than 0.20 kg VOC/kg coating solids applied, calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method

Compliance shall be based upon the on the record keeping requirements in Section A.III.2 of these terms and conditions.

d. Emission Limitation

The permittee shall not discharge into the atmosphere emissions of more than 8 percent of the HAPs to coating solids applied (0.08 kg HAP/kg solids) , calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method

Compliance shall be based upon the on the record keeping requirements in Section A.III.3 of these terms and conditions.

e. The permittee shall not discharge into the atmosphere emissions of more than 1.6 percent of the HAPs to the mass of coating, applied (0.016 kg HAP/kg solids) , calculated as a mass-weighted average for each calendar month.

Applicable Compliance Method

Compliance shall be based upon the on the record keeping requirements in Section A.III.3 of these terms and conditions.

f. Emission Limitation:

1.4 pounds per hour and 6.2 tons per year of $NO_X$

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 100 pounds $NO_X$ per million cubic feet of natural gas (EPA AP-42, July 1998, Section 1.4, Natural Gas Combustion) by the maximum hourly natural gas combustion capacity (14,000 $ft^3$/hr) of this emissions unit. If required by Ohio EPA, emission testing to determine compliance with the above emission limitation shall be perform, using method 1 - 4 and 7 of 40 CFR Part 60, appendix A.

Compliance with the annual limit shall be assumed providing that compliance with the hourly limit is established

g. Emission Limitation:

1.2 pounds per hour and 5.2 tons per year of CO

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 84 pounds CO per million cubic feet of natural gas (EPA AP-42, July 1998, Section 1.4) by the maximum hourly natural combustion capacity (14,000 $ft^3$/hr) of this emissions unit. If required by Ohio EPA, emission testing to determine compliance with the above emission limitation shall be perform, using method 1 - 4 and 10 of 40 CFR Part 60, appendix A.

Compliance with the annual limit shall be assumed providing that compliance with the hourly limit is established

2. USEPA Method 24 or GCMS, Capillary Column Technique Method 8260A shall be used to determine the VOC contents of the coating and cleanup materials employed in this emissions unit.

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## VI. Miscellaneous Requirements

None

## B. State Only Enforceable Section

## I. Applicable Emissions Limitations and/or Control Requirements

**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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K003 - Coating Line CF-3 - paper, film, and other web substrate roll coating line with drying oven, wind and unwind station, and web treatment to coat 100% solid silicones and emulsion topcoats | OAC rule 3745-31-05<br><br>Air Toxics Policy | See Monitoring and Recordkeeping |

**2. Additional Terms and Conditions**

**2.a** None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit, K003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3 model. The predicted 1-hour maximum ground level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

| | |
|---|---|
| Pollutant: | 2-butoxyethanol |
| TLV ($mg/m^3$): | 120 |
| Maximum Hourly Emission Rate (lbs/hr): | 2.14 |
| Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): | 59.1 |
| MAGLC ($\mu g/m^3$): | 2,857 |

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

a. changes in the composition of the materials used (typically coatings and cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased or decreased exhaust flow, changes in stack height, changers in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a modification under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

None

## V. Testing Requirements

None

## VI. Miscellaneous Requirements

None