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

8/12/2011

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.

Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Avery Dennison, Specialty Tape Division, Bldg. 14&19
Facility ID: 0243081177
Permit Type: Initial
Permit Number: P0105953

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northeast District Office

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

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Ohio | Environmental Protection Agency

# PROPOSED

# Division of Air Pollution Control
# Title V Permit
for
Avery Dennison, Specialty Tape Division, Bldg. 14&19

| | |
|---|---|
| Facility ID: | 0243081177 |
| Permit Number: | P0105953 |
| Permit Type: | Initial |
| Issued: | 8/12/2011 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

Ohio | Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
Avery Dennison, Specialty Tape Division, Bldg. 14&19

**Table of Contents**


Authorization ..... 1
A. Standard Terms and Conditions ..... 2
1. Federally Enforceable Standard Terms and Conditions ..... 3
2. Monitoring and Related Record Keeping and Reporting Requirements ..... 3
3. Scheduled Maintenance ..... 6
4. Risk Management Plans ..... 7
5. Title IV Provisions ..... 7
6. Severability Clause ..... 7
7. General Requirements ..... 7
8. Fees ..... 8
9. Marketable Permit Programs ..... 8
10. Reasonably Anticipated Operating Scenarios ..... 9
11. Reopening for Cause ..... 9
12. Federal and State Enforceability ..... 9
13. Compliance Requirements ..... 10
14. Permit Shield ..... 11
15. Operational Flexibility ..... 11
16. Emergencies ..... 12
17. Off-Permit Changes ..... 12
18. Compliance Method Requirements ..... 12
19. Insignificant Activities or Emissions Levels ..... 13
20. Permit to Install Requirement ..... 13
21. Air Pollution Nuisance ..... 13
22. Permanent Shutdown of an Emissions Unit ..... 13
23. Title VI Provisions ..... 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only ..... 14
25. Records Retention Requirements Under State Law Only ..... 14
26. Inspections and Information Requests ..... 14
27. Scheduled Maintenance/Malfunction Reporting ..... 15
28. Permit Transfers ..... 15

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

B. Facility-Wide Terms and Conditions ..... 16

C. Emissions Unit Terms and Conditions ..... 18

1. K001, I-4 HOT MELT COATER ..... 19
2. K003, I-6 COATER Building #14 ..... 26
3. K005, I-10 Adhesive Coater ..... 33

# Authorization

Facility ID: 0243081177
Facility Description: Manufacturer of pressure sensitive tape and film
Application Number(s): A0037612
Permit Number: P0105953
Permit Description: Manufacturer of pressure sensitive tape and film
Permit Type: Initial
Issue Date: 8/12/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Avery Dennison, Specialty Tape Division, Bldg. 14&19
7100 Lindsay Drive
Mentor, OH 44060

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

## *2.* Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule,

all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northeast District Office.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. 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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. 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, in accordance with Standard Term and Condition A.11 below. 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.

(1) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## 8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## 9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

## 10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

## 11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## 12. 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.

*(Authority for term: OAC rule 3745-77-07(B))*

## 13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

## 16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## 17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## 18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention Requirements Under State Law Only**

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.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

**28. 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.

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

# B. Facility-Wide Terms and Conditions

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

a) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJ: K001, K003 and K005.

The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://efcr.gpoaccess.gov (http://efcr.gpoaccess.gov/) or by contacting the Ohio EPA Northeast District Office.

3. On May 16, 2011, U.S. EPA decided to Stay the Boiler MACT (40 CFR Part 63, Subpart DDDDD). This delay of effectiveness will remain in place until the proceedings for judicial review are completed or U.S. EPA completes its reconsideration of the rules, whichever is earlier, and the Agency publishes a notice in the Federal Register announcing that the rules are in effect. Upon being effective, any fuel fired emissions unit, located at this facility with applicable requirements from the boiler MACT will be subject to 40 CFR Part 63, Subpart DDDDD.

4. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H) or because they meet the “de minimis” criteria established in OAC rule 3745-15-05:

B001: #2 fuel oil natural gas heater for adhesive melting on I-4;

K007: Arsoma Press line processing printing with non-VOC UV cured inks;

P004: 7100-1 Vinyl film perforation unit (Building #14); and

P005: I-10 coater solvent based wash tank for cleaning coating parts.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install (PTI) for this emissions unit.

# C. Emissions Unit Terms and Conditions

## 1. K001, I-4 HOT MELT COATER

**Operations, Property and/or Equipment Description:**

**Hot melt adhesive die coating line and associated equipment used to melt, blend, and apply adhesive compound paper or plastic film, Building #14**

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3) as effective 11/30/01<br>(PTI 02-2982 - issued on November 26, 1986) | Volatile organic compound (VOC) emissions shall not exceed 1.36 pounds per hour for all coatings employed, including cleanup, as a daily average.<br><br>VOC emissions shall not exceed 5.94 tons per year, including cleanup and organic HAPs.<br><br>Best available technology (BAT) includes compliance with OAC rule 3745-21-09(F).<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(A)(3)(b) as effective 12/01/06 | See b)(2)b. |
| c. | OAC rule 3745-21-09(F) | For all coatings employed in this emissions unit, the VOC content shall not exceed 2.9 pounds per gallon of coating, as applied, excluding water and exempt solvents. |
| d. | 40 CFR Part 60, Subpart RR | See b)(2)c. |
| e. | 40 CFR Part 63, Subpart JJJJ | See b)(2)d. |
| f. | 40 CFR Part 63, Subpart A | Table 2 to Subpart JJJJ of 40 CFR Part 63 - Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.15 apply. |

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements for VOCs pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply since the potential to emit for VOC (including controls) will be less than 10 tons per year.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP.

Once the December 1, 2006 version of OAC rule 3745-31-05 is included in the Ohio SIP, BAT shall not be applicable as the potential to emit for VOCs (including controls) will be < 10 tpy.

c. This emissions unit is exempt from the requirements of 40 CFR Part 60, Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", and the emissions limitations described in 40 CFR 60.442(a) because the VOC input to this coating line is less than 45 Mg (50 tons) per 12 month period. If the amount of VOC exceeds 45 Mg per 12 month period, this emissions unit will no longer be exempt from 40 CFR Part 60, Subpart RR.

d. Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR Part 63.3330, the source must limit HAP emissions from the affected source to no more than 1.6 percent of the mass of coating materials applied for each month.

This emissions unit is subject to the requirements of 40 CFR Part 63, Subpart JJJJ, "Paper and Other Web Coating", and the emission limitations described therein.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3320 | Organic HAP emissions |
| 63.3321 and Table 1 to Subpart JJJJ | Capture system, control devices and operating limits |
| 63.3370(c)(4) | HAP content restrictions in coatings, |
| 63.3370(e)(f)(h)(k) | Capture and control requirements; restriction of HAP emissions |

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJJJ]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information daily for all coatings employed in this emissions unit:

a. the name and identification of each coating employed;

b. the VOC content of each coating (including HAPs), as applied, in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating employed, excluding water and exempt solvents; and

d. the total VOC emissions from all coatings (including HAPs), in pounds (b x c).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(2) The permittee shall collect and record the following information daily for all cleanup materials employed in this emissions unit:

a. the name and identification of each cleanup material, as employed;

b. the VOC content (including HAPs) of each cleanup material, as employed;

c. the number of gallons of each cleanup material, as employed; and

d. the total VOC emissions from cleanup materials (including HAPs), in pounds (b x c).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(3) The permittee shall collect and record the following information daily for all coatings and cleanup materials employed in this emissions unit:

a. the total daily VOC emissions from all coatings and cleanup materials (including HAPs), in pounds [the sum of d)(1)d + d)(2)d];

b. the total operating hours of the emissions unit;

c. the average hourly VOC emission rate, in pounds per hour (a/b); and

d. the total VOC emitted to date, in tons per year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(4) The permittee shall collect and record the following information monthly for all organic hazardous air pollutants (HAPs) from all coatings:

a. the mass of organic HAPs applied in all coatings employed, in pounds and tons;

b. the mass of coating materials applied, in pounds and tons;

c. the mass of coating solids applied, in pounds and tons;

d. the percent of HAPs applied per coating materials applied; and

e. the percent of HAPs applied per coating solids applied.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(5) The total monthly HAP applied shall be determined by Equation 6 of Section 63.3370 of 40 CFR Part 63, Subpart JJJJ, as follows:

$$H_m = \sum_{i=1}^{p} C_{hi}M_i + \sum_{j=1}^{q} C_{hij}M_{ij} - M_{vret}$$

where:

Hm = total monthly organic HAP 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, lb/lb;

Mi = mass of as-purchased coating material, i, applied in a month, lb;

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, lb/lb;

Mij = mass of material, j, added to as-purchased coating material, i, in a month, lb; and

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 40 CFR 63.3370.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-2982 and 40 CFR Part 63, Subpart JJJJ]

(6) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3340 | Startup, Shutdown and Malfunction Plans and other General Provisions of Subpart A |
| 63.3350 | Control Device Monitoring and/or other General Provisions to Subpart JJJJ |
| 63.3350(b)(c)(e) and (f); 63.3410(a)(1)ii, v, and (2) | Capture System and Control Device, if applicable, operating parameter data; Monitoring and Recordkeeping |

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing, on a monthly basis, of any daily record showing that the VOC content of any coating exceeded the applicable limitation of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(2) The permittee shall submit quarterly deviation (excursions) reports that identify any and all exceedances of the hourly limitation of 1.36 lbs of VOC per hour for the coatings employed.

Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the Ohio SIP, BAT shall not be applicable as the potential to emit for VOCs (including controls) will be less than 10 tons per year and e) (2) will be voided.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(4) The permittee shall submit quarterly deviation (excursion) reports that identify any and all exceedances of the percent HAP content of the mass of coating materials applied for each month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(5) The permittee shall submit semiannual reports and such other notifications and reports to the Administrator and/or the Ohio EPA Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3400(b) | Initial notification report |
| 63.3400(c) | Semiannual compliance report |
| 63.3400(d) | Notification of performance test |
| 63.3400(e) and | Notification of compliance status |
| 63.3400(f) | Notification of performance test results |

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

(1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

VOC emissions shall not exceed 1.36 pounds per hour for all coatings employed, including cleanup, as a daily average.

VOC emissions shall not exceed 5.94 tons per year, including cleanup and organic HAPs.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1), d)(2) and d)(3).

b. Emission Limitation:

For all coatings employed in this emissions unit, the VOC content shall not exceed 2.9 pounds per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)b.

c. Emission Limitation:

HAP emissions from this emissions unit shall not exceed 1.6 percent of the mass of coating materials applied for each month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4) and d)(5).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) Since the requirements of OAC rule 3745-21-04(B)(5) to use Method 24 to determine the VOC contents for all coatings has been or will be rescinded and as described in section 3745-21-10(B)(4) of the Ohio Administrative Code, and since the applicable requirement, that is the most stringent VOC content requirement, according to Avery, comes from the NSPS (which allows for the use of formulation data) VOC contents for all coatings, where appropriate, shall be determined using the procedures set forth in "Method 24 (for coatings) and 24A (for flexographic and rotogravure printing inks and related coatings), 40 CFR Part 60, Appendix A"; or

the coating formulation data from the coating manufacturer and coating user.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Appendix A, Method 24]

(3) The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3360 | Performance Tests |
| 63.3370(a)(4) | Overall organic HAP control efficiency (destruction and capture efficiency) |

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

## 2. K003, I-6 COATER Building #14

**Operations, Property and/or Equipment Description:**

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3) as effective 11/30/01<br>(PTI 02-2982 - issued on November 26, 1986) | Volatile organic compound (VOC) emissions shall not exceed 0.68 pound per hour for all coatings employed, including cleanup, as a daily average.<br><br>VOC emissions shall not exceed 3.0 tons per year, including cleanup and organic HAPs.<br><br>Best available technology (BAT) includes compliance with OAC rule 3745-21-09(F).<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(A)(3) as effective 12/01/06 | See b)(2)b. |
| c. | OAC rule 3745-21-09(F) | For all coatings employed in this emissions unit, the VOC content shall not exceed 2.9 pounds per gallon of coating, as applied, excluding water and exempt solvents. |
| d. | 40 CFR Part 60, Subpart RR | See b)(2)c. |
| e. | 40 CFR Part 63, Subpart JJJJ | See b)(2)d. |
| f. | 40 CFR Part 63, Subpart A | Table 2 to Subpart JJJJ of 40 CFR Part 63 - Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.15 apply. |

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements for VOC pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply since the potential to emit for VOC (including controls) will be less than 10 tons per year.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP.

Once the December 1, 2006 version of OAC rule 3745-31-05 is included in the Ohio SIP, BAT shall not be applicable as the potential to emit for VOCs (including controls) will be less than 10 tpy.

c. This emissions unit is exempt from the requirements of 40 CFR Part 60, Subpart RR, "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations", and the emissions limitations described in 40 CFR Part 60.442(a) because the VOC input to this coating line is less than 45 Mg (50 tons) per 12 month period. If the amount of VOC exceeds 45 Mg per 12 month period, this emissions unit will no longer be exempt from 40 CFR Part 60, Subpart RR.

d. Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR Part 63.3330, the source must limit HAP emissions from the affected source to no more than 1.6 percent of the mass of coating materials applied for each month.

This emissions unit is subject to the requirements of 40 CFR Part 63, Subpart JJJJ, "Paper and Other Web Coating", and the emission limitations described therein.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3320 | Organic HAP emissions |
| 63.3321 and Table 1 to Subpart JJJJ | Capture system, control devices and operating limits |
| 63.3370(c)(4) | HAP content restrictions in coatings, |
| 63.3370(e)(f)(h)(k) | Capture and control requirements; restriction of HAP emissions |

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information daily for all coatings employed in this emissions unit:

a. the name and identification of each coating employed;

b. the VOC content of each coating (including HAPs), as applied, in pounds per gallon, excluding water and exempt solvents;

c. the number of gallons of each coating employed, excluding water and exempt solvents; and

d. the total VOC emissions from all coatings (including HAPs), in pounds (b x c).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(2) The permittee shall collect and record the following information daily for all cleanup materials employed in this emissions unit:

a. the name and identification of each cleanup material, as employed;

b. the VOC content (including HAPs) of each cleanup material, as employed;

c. the number of gallons of each cleanup material, as employed; and

d. the total VOC emissions from cleanup materials (including HAPs), in pounds (b x c).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(3) The permittee shall collect and record the following information daily for all coatings and cleanup materials employed in this emissions unit:

a. the total daily VOC emissions from all coatings and cleanup materials (including HAPs), in pounds [the sum of d)(1)d + d)(2)d];

b. the total operating hours of the emissions unit;

c. the average hourly VOC emission rate, in pounds per hour (a/b); and

d. the total VOC emitted to date, in tons per year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(4) The permittee shall collect and record the following information monthly for all organic hazardous air pollutants (HAPs) from all coatings:

a. the mass of organic HAPs applied in all coatings employed, in pounds and tons;

b. the mass of coating materials applied, in pounds and tons;

c. the mass of coating solids applied, in pounds and tons;

d. the percent of HAPs applied per coating materials applied; and

e. the percent of HAPs applied per coating solids applied.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(5) The total monthly HAP applied shall be determined by Equation 6 of Section 63.3370 of 40 CFR Part 63, Subpart JJJJ, as follows:

$$H_m = \sum_{i=1}^{p} C_{hi} M_i + \sum_{j=1}^{q} C_{hij} M_{ij} - M_{vret}$$

where:

Hm = total monthly organic HAP 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, lb/lb;

Mi = mass of as-purchased coating material, i, applied in a month, lb;

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, lb/lb;

Mij = mass of material, j, added to as-purchased coating material, i, in a month, lb; and

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 40 CFR 63.3370.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(6) The permittee shall comply with the applicable monitoring and record keeping as is required pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3340 | Startup, Shutdown and Malfunction Plans and other General Provisions of Subpart A |
| 63.3350 | Control Device Monitoring and other General Provisions to Subpart JJJJ |
| 63.3350(b)(c)(e) and (f); 63.3410(a)(1)ii, v, and (2) | Capture System and Control Device operating parameter data; Monitoring and Recordkeeping |

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing, on a monthly basis, of any daily record showing that the VOC content of any coating exceeded the applicable limitation of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(2) The permittee shall submit quarterly deviation (excursions) reports that identify any and all exceedances of the hourly limitation of 0.68 lbs of VOC per hour for the coatings employed.

Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the Ohio SIP, BAT shall not be applicable as the potential to emit for VOCs (including controls) will be less than 10 tons per year and e)(2) will be voided.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(4) The permittee shall submit quarterly deviation (excursion) reports that identify any and all exceedances of the percent HAP content of the mass of coating materials applied for each month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

(5) The permittee shall submit semiannual reports and such other notifications and reports to the Administrator and/or the Ohio EPA Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3400(b) | Initial notification report |
| 63.3400(c) | Semiannual compliance report |
| 63.3400(d) | Notification of performance test |
| 63.3400(e) and | Notification of compliance status |
| 63.3400(f) | Notification of performance test results |

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

(1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

VOC emissions shall not exceed 0.68 pound per hour for all coatings employed, including cleanup, as a daily average.

VOC emissions shall not exceed 3.0 tons per year, including cleanup and organic HAPs.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1), d)(2) and d)(3).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

b. Emission Limitation:

For all coatings employed in this emissions unit, the VOC content shall not exceed 2.9 pounds per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)b.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-2982]

c. Emission Limitation:

HAP emissions from this emissions unit shall not exceed 1.6 percent of the mass of coating materials applied for each month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4) and d)(5).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

(2) Since the requirements of OAC rule 3745-21-04(B)(5) to use Method 24 to determine the VOC contents for all coatings has been or will be rescinded and as described in section 3745-21-10(B)(4) of the Ohio Administrative Code, and since the applicable requirement, that is the most stringent VOC content requirement, according to Avery, comes from the NSPS (which allows for the use of formulation data) VOC contents for all coatings, where appropriate, shall be determined using the procedures set forth in "Method 24 (for coatings) and 24A (for flexographic and rotogravure printing inks and related coatings), 40 CFR Part 60, Appendix A"; or

the coating formulation data from the coating manufacturer and coating user.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Appendix A, Method 24]

(3) The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3360 | Performance Tests |
| 63.3370(a)(4) | Overall organic HAP control efficiency (destruction and capture efficiency) |

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

(1) None.

**3. K005, I-10 Adhesive Coater**

**Operations, Property and/or Equipment Description:**

**(K005) - Adhesive coater equipped with web unwind, web treatment roll-coat station, drying oven, web rewind, and a regenerative thermal oxidizer (RTO) (K005) - Building #19**

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3) as effective 11/30/01 | Volatile organic compound (VOC) emissions shall not exceed 5.1 pounds per hour from the coating line, including cleanup, as a daily average and 23.0 tons per rolling, 12 month period, including cleanup materials.<br><br>Nitrogen oxides ($NO_x$) emissions shall not exceed 1.4 lbs/hr and 6.1 tpy.<br><br>Carbon monoxide (CO) emissions shall not exceed 1.2 lbs/hr and 4.9 tpy.<br><br>The BAT determination also includes compliance with OAC rule 3745-21-09(F), 40 CFR Part 60, Subpart RR and 40 CFR Part 63, Subpart JJJJ.<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(A)(3)(b) as effective 12/01/06 | See b)(2)b. |
| c. | OAC rule 3745-31-05(D)(1)(a) (synthetic minor for NNSR) | Overall reduction of volatile organic compounds (VOC) emissions shall not be less than 99.5%, by weight, (100% capture efficiency through the use of a permanent total enclosure and 99.5% |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | destruction efficiency) for all solvent based coatings. See b)(2)i.<br><br>VOC emissions shall not exceed 23.0 tons per rolling, 12-month period, including cleanup materials. |
| d. | OAC rule 3745-21-09(F)(1) | For solvent based coatings, the overall VOC emission reduction allowed pursuant to OAC rule 3745-21-09(B)(6) is less stringent than the overall VOC emission reduction established pursuant to OAC rule 3745-31-05(D)(1)(a).<br><br>For non-solvent based coatings, the VOC content limitation required by this applicable rule is less stringent than the VOC content limitation established pursuant to 40 CFR Part 60, Subpart RR. See b)(1)g and b)(2)h. |
| e. | OAC rule 3745-21-09(F)(2)(a) | For solvent based coatings, the VOC control efficiency required by this applicable rule is less stringent than the overall VOC emission reduction established pursuant to OAC rule 3745-31-05(D)(1)(a). See b)(1)c and b)(2)g.<br><br>For non-solvent based coatings, the VOC content limitation required by this applicable rule is less stringent than the VOC content limitation established pursuant to 40 CFR Part 60, Subpart RR. See b)(1)g and b)(2)h. |
| f. | OAC rule 3745-21-09(F)(2)(b) | See c)(7). |
| g. | 40 CFR Part 60, Subpart RR | For solvent based coatings, the overall VOC emission reduction required by this applicable rule is less stringent than the overall VOC emission reduction established pursuant to OAC rule 3745-31-05(D)(1)(a). See b)(1)c and b)(2)g.<br><br>For all coatings that are not vented to the RTO (non-solvent based coatings) the VOC content shall not exceed 0.2 kg of VOC per kg of solids, applied as calculated on a weighted average basis for one calendar month. See b)(2)h. |

| | | |
|---|---|---|
| h. | 40 CFR Part 63, Subpart JJJJ [63.3320(b)(1) through b)(4)] | See B.2, b)(2)j and b)(2)k. |
| i. | 40 CFR Part 63, Subpart A | Table 2 to Subpart JJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.15 apply. |
| j. | 40 CFR Part 63, Subpart DDDDD | See B.3 and b)(2)f. |

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements for $NO_x$ and CO pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph(A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures for $NO_x$ and CO no longer apply.

BAT emission limitations for $NO_x$ and CO for this emissions unit are based on maximum capacity and operating hours for this emissions unit, i.e. the potential to emit and therefore record keeping and monitoring is not required.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP.

Then, BAT requirements under OAC rule 3745-31-05(A) do not apply to the $NO_x$ and CO emissions from this air contaminant source since the uncontrolled potential to emit for $NO_x$ and CO is less than 10 tons per year.

c. During solvent based coating operations, this emissions unit shall be vented to the RTO. This emissions unit has no bypass of the thermal oxidizer which would allow for intermittently controlled coating operations, however emergency dampers have been installed that would allow bypassing to protect employee safety and the facility.

Therefore, at this time, this emissions unit is not capable of routinely venting emissions from coating to atmosphere.

In the event that this venting configuration is modified such that this emissions unit is capable of venting emissions from coating to atmosphere, the Northeast District of the Ohio EPA shall be notified, and, if required, an appropriate permit application shall be submitted.

d. The permittee shall not concurrently apply solvent based coatings through the roll and the die coater.

e. VOC emissions before control from this emissions unit shall not exceed 4,444 tons per rolling, 12 months, unless approved by Ohio EPA, calculated using the following formula:

$$4{,}444.0 \text{ tons VOC} > \sum_{i=1}^{n} \frac{(P_i)(VOC_i) \times (1-.995)}{2000 \text{lbs/ton (RTO)}} + 0.32 = 23.0 \text{ TPY}$$

[4,444 x (1- 99.5) = 22.2 (+ 0.32 ) = 23.0 TPY]

where:

Pi = usage of the coating and cleanup material i, in gallons during the last 12 months; and

VOCi = volatile organic compound content of coating i, cleanup material i, in pounds per gallon.

f. This coater is located in Building #19 and uses a hot oil system, for heat transfer, that provides heat for the drying ovens, which are part of this emissions unit. The oil is heated by residual heat from the RTO.

g. A solvent based coating is any coating that has a VOC content greater than 0.20 kg VOC per kg coating solids or 2.9 pounds of VOC per gallon of coating, as applied, whichever is more stringent, depending on the coating. All solvent based coatings from the adhesive coating operation shall be vented to the RTO.

h. A non-solvent based coating is any coating that has a VOC content less than or equal to 0.20 kg VOC per kg coating solids or 2.9 pounds of VOC per gallon of coating, as applied, whichever is more stringent, depending on the coating.

i. The permittee shall maintain a permanent total enclosure (PTE) that complies with the requirements of 40 CFR Part 51, Appendix M, Reference Method 204, to capture all VOC emissions from this emissions unit during solvent based coating operations.

j. Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR Part 63.3330, the permittee shall limit organic HAP emissions to the level specified in b)(2)j.i, b)(2)j.ii, b)(2)j.iii or b)(2)j.iv below:

**i.** no more than 2 percent of the organic HAP applied for each month (98 percent reduction); or

**ii.** no more than 1.6 percent of the mass of coating materials applied for each month; or

**iii.** no more than 8 percent of the coating solids applied for each month.

**iv.** If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

k. The permittee shall comply with all applicable requirements in the MACT for Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ.

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Section 63.3360 and P0107135]

(2) When employing solvent based coatings, this emissions unit shall be totally enclosed such that all VOC emissions are captured, contained, and vented to the RTO. Compliance with the following criteria, as specified in 40 CFR Part 51, Appendix M, Method 204, shall be met by the permittee when employing coatings:

a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.

b. The total area of all NDOs 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 NDOs shall be either at least 3,600 meters/hr (200 fpm) or meet the pressure differential requirement across the enclosure as described in the Method. The direction of air flow through all NDOs 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0107135]

(3) The thermal oxidizer control system shall be designed and operated according to good engineering practices and the manufacturer's recommendations and specifications.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0107135]

(4) When this emissions unit is in operation, the PTE shall be maintained under negative pressure at a minimum differential pressure, in inches of water as a 3-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 corresponding facial velocity or pressure drop criteria for the PTE. The differential pressure corresponding to the 200 fpm facial velocity shall be determined for the PTE when compliance with the facial velocity is demonstrated.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0107135]

(5) The concentrations of VOC emissions from the positive pressure locations for this emissions unit, determined in accordance with the leak monitoring program currently used at Building 5 for the PTE, shall not exceed 100 ppm, by volume.

[Authority for term: OAC rule 3745-77-07(A)(1) and P0107135]

(6) 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).

[Authority for Term: OAC rule 3745-77-07(A)(1) and P0107135]

(7) Work practice standards for cleaning materials pursuant to OAC rule 3745-21-09(F)(2)(b)

For emissions from the use of organic solvents for cleanup, the permittee shall:

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

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

c. minimize spills of VOC-containing cleaning materials;

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

e. minimize VOC emissions from cleaning of storage, mixing, and conveying equipment.

[Authority for Term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(F)(2)]

(8) The permittee shall comply with the applicable restrictions required pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3320 | Organic HAP emissions |
| 63.3321 and Table 1 to Subpart JJJJ | Capture system, control devices and operating limits |
| 63.3360 | Performance Tests |
| 63.3370(a)(4) | Overall organic HAP control efficiency (destruction and capture efficiency) |
| 63.3370(c)(4) | HAP content restrictions in coatings |
| 63.3370(e)(f)(h)(k) | Capture and control requirements; restriction of HAP emissions |

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJJJ]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when this 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 monitors and recorders 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 RTO, when the emissions unit was in operation, was below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

b. a log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation; and

c. a record of any periods of time when the emissions unit is in operation, but the VOC emissions are not vented to the RTO.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(2) The permittee shall operate and maintain a continuous pressure drop monitor and recorder that continuously measures and records the pressure drop across the PTE when the permittee is employing solvent based coatings. 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 employing solvent based coatings:

a. all 3-hour blocks of time when the emissions unit is in operation, during which the PTE was not maintained at or above the minimum pressure differential, in inches of water as a 3-hour average, specified in c)(4); and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(3) The permittee shall collect and record the following information daily for all coatings employed in this emissions unit:

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

b. the VOC content of each coating, as applied, in pounds per gallon, excluding water and exempt solvents;

c. whether or not the emissions from the coating were vented to the RTO or to atmosphere;

d. the number of gallons of each coating employed, excluding water and exempt solvents;

e. the total uncontrolled VOC emissions from all coatings employed, in pounds and tons;

f. the total uncontrolled VOC emissions from all coatings employed, vented to atmosphere; and

g. the calculated, controlled VOC emission rate for all coatings, in pounds and tons (the controlled VOC emission rate for coatings shall be calculated using the overall control efficiency for the control equipment as determined during the most recent compliance test that demonstrated that the emissions unit was in compliance).

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(4) The permittee shall collect and record the following information daily for all cleanup materials:

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon; and

d. the total VOC emissions from all cleanup materials employed in pounds and tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(5) The permittee shall record the following information daily:

a. the total VOC emissions from all coatings and cleanup materials (the sum of the values from d)(3)f, d)(3)g and d)(4)d, in pounds;

b. the total operating hours for the emissions unit;

c. the average hourly emission rate, in pounds per hour (a/b); and

d. after the first year, the rolling, 12-month summation of the controlled VOC emissions from all coatings and cleanup materials, in tons (365-day summation of d)(3)f)

Note: If any coatings were employed in this emissions unit and not vented to the RTO, their VOC contents shall be included in the 12-month summation in d)(5)d.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(6) For all coatings that are employed in this emissions unit, and not vented to the RTO, the permittee shall collect and record the following information monthly:

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

b. the VOC content of each coating, in kg/kg of coating solids, as applied;

c. the weight fraction of VOC in each coating;

d. the weight fraction of solids in each coating;

e. the total mass of each coating, in kgs; and

f. the mass-weighted average VOC content for all the coatings employed, in kg/kg of coating solids, calculated in accordance with the equation in 40 CFR 60.443(a)(2).

If the VOC content of each coating 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(7) The permittee shall collect and record the following information monthly for all organic HAPs from all coatings that are not vented to the RTO:

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

b. the total mass of organic HAPs applied in all coatings employed, in pounds and tons;

c. the mass of coating materials applied, in pounds and tons;

d. the mass of coating solids applied, in pounds and tons;

e. the percent of HAPs, applied per coating materials applied; and/or

f. the percent of HAPs, applied per coating solids applied.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(8) The total monthly HAP, applied shall be determined by Equation 6 of Section 63.3370 of 40 CFR Part 63, Subpart JJJJ, as follows:

$$H_m = \sum_{i=1}^{p} C_{hi}M_i + \sum_{j=1}^{q} C_{hij}M_{ij} - M_{vret}$$

where:

Hm = total monthly organic HAP 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, lb/lb;

Mi = mass of as-purchased coating material, i, applied in a month, lb;

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, lb/lb;

Mij = mass of material, j, added to as-purchased coating material, i, in a month, lb; and

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 40 CFR 63.3370.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(9) The permittee shall inspect and monitor quarterly with a Photoionization Detector or equivalent device all positive pressure locations between the permanent total enclosure of the coater and the RTO for unacceptable VOC levels (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 the inspection results and shall include the following:

a. line speed;

b. fan speed (frequency may be measured in hertz, an indirect measure of fan speed);

c. VOC content or coating specification at the time of monitoring;

d. documentation of any unacceptable VOC levels; and

e. any corrective actions taken in response to any detected leaks.

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(10) The permittee shall employ the plan for preventive maintenance and repair of leaks within the solvent capture and destruction system, as submitted by Avery Dennison to the Ohio EPA on August 10, 1998, or equivalent.

Equipment subject to the plan shall include all ductwork from the enclosures of the heads of the coaters to the RTO fan covers.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(11) Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(12) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3340 | Startup, Shutdown and Malfunction Plans and other General Provisions of Subpart A |
| 63.3350 | Control Device Monitoring and other General Provisions to Subpart JJJJ |
| 63.3350(b)(c)(e) and (f); 63.3410(a)(1)ii, v, and (2) | Capture System and Control Device operating parameter data; Monitoring and Recordkeeping |

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

e) Reporting Requirements

(1) The permittee shall submit quarterly summary reports that identify the following information:

a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified above; and

b. all periods of downtime for the capture (collection) system, control device, and monitoring equipment, when the associated coating or printing line was operating and employing coatings.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential required in c)(4).

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC of 23.0 tons.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(5) The permittee shall submit deviation (excursion) reports that identify all exceedances of the average hourly emission limitation for VOC of 5.1 pounds.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(6) The permittee shall submit deviation (excursion) reports that identify all exceedances of the percent HAP content of the mass of coating materials applied for each month.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(7) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any quarterly record showing any unacceptable level of VOCs (greater than 100 ppm) from the positive pressure locations of the lines between the PTE and the RTO. A copy of the record shall be sent to the Ohio EPA Northeast District Office within 30 days following the end of the calendar month in which the exceedance occurred.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(8) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record showing that emissions from solvent based coatings employed in this emissions unit were not vented to the RTO.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(9) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record showing that emissions from non-solvent based coatings employed in this emissions unit exceeded the maximum allowable VOC content of 0.20 kilogram of VOC per kilogram of solids, calculated as a monthly mass weighted average.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(10) The permittee shall submit semiannual reports and such other notifications and reports to the Administrator and/or the Ohio EPA Northeast District Office as are required pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3400(b) | Initial notification report |
| 63.3400(c) | Semiannual compliance report |
| 63.3400(d) | Notification of performance test |
| 63.3400(e) and | Notification of compliance status |
| 63.3400(f) | Notification of performance test results |

[Authority for Term: OAC rule 3745-77-07(c)(1) and 40 CFR Part 63, Subpart JJJJ]

f) Testing Requirements

(1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

Overall reduction of volatile organic compounds (VOC) emissions shall not be less than 99.5%, by weight, (100% capture efficiency through the use of a

permanent total enclosure and 99.5% destruction efficiency) for all solvent based coatings.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in f)(2).

Performance testing shall be conducted for the permanent total enclosure and the destruction efficiency within 5 years of the most recent performance test using the methods specified in f)(2) of this section.

b. Emission Limitation:

VOC emissions shall not exceed 5.1 pounds per hour from the coating line, including cleanup, as a daily average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)5 and an emission test performed in accordance with the methods and procedures specified in f)(2).

c. Emission Limitation:

VOC emissions shall not exceed 23.0 tons per rolling, 12 month period, including cleanup materials.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)5.

d. Emission Limitation:

For all coatings that are not vented to the RTO (non-solvent based coatings) the VOC content shall not exceed 0.2 kg of VOC per kg of solids, applied as calculated on a weighted average basis for one calendar month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR 60.446(a), or any alternative compliance method approved by the USEPA for determining the VOC content of each coating, and on the record keeping requirements specified in d)(6).

e. Emission Limitation:

Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR Part 63.3330, the permittee shall limit organic HAP emissions to the level specified in f)(1)e.i, f)(1)e.ii, f)(1)e.iii or f)(1)e.iv below:

**i.** no more than 2 percent of the organic HAP applied for each month (98 percent reduction); or

**ii.** no more than 1.6 percent of the mass of coating materials applied for each month; or

**iii.** no more than 8 percent of the coating solids applied for each month.

**iv.** If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR 63.3360(d), or any alternative compliance method approved by the USEPA for determining the VOC/HAP content of each coating, and on the record keeping requirements specified in d)(7) and d)(8).

Compliance with the 98 percent reduction and the outlet organic HAP concentration shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in f)(2).

Performance testing shall be conducted for the permanent total enclosure and the destruction efficiency within 5 years of the most recent performance test using the methods specified in f)(2) of this section.

f. Emission Limitation:

$NO_x$ emissions from this emissions unit shall not exceed 1.4 pounds per hour and 6.1 tons per year.

Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the Ohio SIP, BAT shall not be applicable as the potential to emit for $NO_x$ (including controls) will be less than 10 tons per year and the $NO_x$ emission limitations shall be voided.

Applicable Compliance Method:

Compliance may be determined by multiplying the emission factor of 100 pounds of $NO_x$ 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 ft3/hr) of this unit.

If required, emission testing to demonstrate compliance with the pound per hour emission limitation shall be performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

The ton per year emission limitation was developed by multiplying the short-term allowable $NO_x$ emission limitation (1.4 lbs/hr) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs per ton. Therefore, if compliance is shown with the short-term emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

CO emissions from this emissions unit shall not exceed 1.2 pounds per hour and 4.9 tons per year.

Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the Ohio SIP, BAT shall not be applicable as the potential to emit for CO (including controls) will be less than 10 tons per year and the CO emission limitations shall be voided.

Applicable Compliance Method:

Compliance may be determined by multiplying the emission factor of 84 pounds of CO 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 ft3/hr) of this unit.

If required, emission testing to demonstrate compliance with the pound per hour emission limitation shall be performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

The ton per year emission limitation was developed by multiplying the short-term allowable CO emission limitation (1.2 lbs/hr) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs per ton. Therefore, if compliance is shown with the short-term emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and P0107135]

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

a. Emission testing, following initial startup (first day that the unit is used in normal production) was completed on 10/31/2008 and demonstrated compliance with the overall control efficiency limitation and capture efficiency for VOC of 99.5% and 100%, respectively, and 98% overall reduction of HAPs and the hourly mass emission limitation of 5.1 pounds VOC per hour.

The permittee shall conduct emission testing within 5 years of the most recent performance test using the methods specified in this section.

The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation and capture efficiency limitation for VOC of

99.5% and 100%, respectively, and 98% overall reduction of HAPs and the hourly mass emission limitation of 5.1 pounds VOC per hour.

b. 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 50 ppm;

Method 204 of 40 CFR Part 51, Appendix M; and

Method 2 of 40 CFR Part 60, Appendix A and Method 204, if differential pressure is selected as a means of complying with the required facial velocity as described in Method 204.

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

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

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

d. 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, neccessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)

e. 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 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(3) The VOC content of all coatings and cleanup materials may be determined in accordance with the procedures specified in 40 CFR 63.3360(d) and 40 CFR 60.446(a), as appropriate.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR 63.3360(d), 40 CFR 60.446(a) and 40 CFR Part 60, Appendix A, Method 24]

Other EPA test methods, including SW-846 and 8260A, or any alternative compliance method including formulation data, manufacturer's specifications, alternative equivalent test methods, may also be used, if approved by USEPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0107135]

(4) The permittee shall comply with the applicable testing requirements pursuant to 40 CFR Part 63, Subpart JJJJ, including the applicable parts of the following sections:

| | |
|---|---|
| 63.3360 | Performance Tests |
| 63.3370(a)(4) | Overall organic HAP control efficiency (destruction and capture efficiency) |

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ]

g. Miscellaneous Requirements

(1) None.