

Facility ID: 0278000800 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit F001](#)
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Facility ID: 0278000800 Emissions Unit ID: F001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking dust collection system saws, sanders, brush cleaners	OAC rule 3745-31-05(A)(3) (PTI 02-22249) OAC rule 3745-17-08(B)(3)(b) OAC rule 3745-17-07(B)(1)	See sections A.2.a, A.2.b, A.2.c and B.1 below. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) Particulate emissions/particulates less than 10 microns in diameter (PE/PM10) shall not exceed 3.0 pounds per hour and 13.0 tons per year from the dust collector exhaust. Visible particulate emissions from the dust collector exhaust stack serving this emissions unit shall not exceed 10% opacity, as a 3-minute average. Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity, as a 3-minute average.

B. Operational Restrictions

1. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control fugitive dust. Such equipment shall have collection efficiency sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the points(s) of capture to the extent possible with good engineering design.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective

actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the dust collector on a weekly basis.

The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the dust collect did not comply with the allowable range specified above, and the corrective measures taken.

E. Testing Requirements

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

Emission Limitation:

Visible particulate emissions from the dust collector exhaust stack serving this emissions unit shall not exceed 10% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the fugitive particulate emissions shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3) and (B)(3)(b) of OAC rule 3745-17-03.

Emission Limitation:

Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the fugitive particulate emissions shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3) and (B)(3)(b) of OAC rule 3745-17-03.

Emission Limitation:

PE/PM10 emissions from the baghouse exhaust stack shall not exceed 3.0 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

Emission Limitation:

PE/PM10 emissions shall not exceed 13.0 tons per year.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following equation:

$$PE/PM10 = 600 \text{ lbs/hr} \times (0.99) \times (1 - 0.995) \times 8760 \text{ hrs/yr} \times 1 \text{ ton}/2000 \text{ lbs}$$

where:

PE/PM10 = annual particulate emissions, in tons per year;
 600 lbs/hr = the maximum wood waste generated as listed in the permit to install application;
 99% = the estimated capture efficiency of hoods, etc.; and
 99.5% = the estimated dust collector control efficiency.

F. Miscellaneous Requirements

1. None

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
dust collection system for sawing operation w/ baghouse	ORC 3704.03(T)(4)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.030 grain per dry standard cubic foot of exhaust gases under OAC rule 3745-17-08(B)(3)(b).
	OAC rule 3745-17-08(B)(3)(b)	Particulate emissions (PE) from the baghouse shall not exceed 0.030 grain per dry standard cubic foot of exhaust gases.
	OAC rule 3745-17-07(B)(1)	Visible PE from the baghouse exhaust and fugitive emissions shall not exceed 20% opacity, as a 3-minute average.

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control fugitive dust. Such equipment shall have collection efficiency sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the points(s) of capture to the extent possible with good engineering design.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the dust collector on a weekly basis.

The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from the from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the dust collect did not comply with the allowable range specified above, and the corrective measures taken.

E. Testing Requirements

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

Emission Limitation:

Visible particulate emissions from the dust collector exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the fugitive particulate emissions shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3) and (B)(3)(b) of OAC rule 3745-17-03.

Emission Limitation:

Visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the fugitive particulate emissions shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3) and (B)(3)(b) of OAC rule 3745-17-03.

Emission Limitation:

PE/PM10 emissions from the baghouse exhaust stack shall not exceed 0.030 gr/dscf .

Applicable Compliance Method:

If required, compliance shall be demonstrated based on an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(7).

F. Miscellaneous Requirements

1. None

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Facility ID: 0278000800 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Lay-up line glue roll, plywood press	OAC rule 3745-31-05(C)	Permit to Install 02-22249 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3): a. volatile organic compounds (VOC) shall not exceed 0.017 pound of VOC per gallon of adhesive, excluding water and exempt solvents, on a daily volume-weighted average; and b. adhesive usage shall not exceed 113,880 gallons per rolling, 12-month period. See sections A.2.b and B.1 below. See section A.2.a below.
	OAC rule 3745-21-07(G)(2)	

2. Additional Terms and Conditions

- (a) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.
The VOC content shall not exceed 0.017 pound of VOC per gallon of adhesive, excluding water and exempt solvent(s), on a daily volume-weighted average, for all adhesives.

B. Operational Restrictions

1. The permittee shall not use more than 113,880 gallons of adhesive per rolling, 12-month period.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each organic compound material employed; and
 - b. documentation on whether or not each organic compound employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each adhesive coating, as applied; and
 - b. the VOC content of each adhesive coating (excluding water and exempt solvents), as applied.
3. The permittee shall collect, record and calculate the following information monthly for this emissions unit:
 - a. the name and identification number of each adhesive coating used;
 - b. the VOC content (excluding water and exempt solvents), in pounds per gallon, of each adhesive coating;
 - c. the total number of gallons (excluding water and exempt solvents) of each adhesive coating used for the month;
 - d. the total monthly VOC emissions from this line, i.e., the summation of (b) times (c) for all adhesive coatings employed; and
 - e. the rolling, 12-month summation of the adhesive coating usage in gallons each month.

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office), in writing of any daily record showing that photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
2. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any monthly record showing the use of noncomplying adhesive coatings. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days following the end of the

calendar month.

3. The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any record for this line showing exceedances of the rolling, 12-month adhesive coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
4. 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.

E. Testing Requirements

1. Compliance with the emission limitation in section A.2.b and the operational restriction in section B.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

The VOC content shall not exceed 0.017 pound of VOC per gallon of adhesive, excluding water and exempt solvent(s), on a daily volume-weighted average, for all adhesives.

Applicable Compliance Method:

OAC rule 3745-21-10(B), USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:

The permittee shall not use more than 113,880 gallons of adhesive per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records for the calendar year from the record keeping requirement specified in section C.3.e.

F. Miscellaneous Requirements

1. None

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Facility ID: 0278000800 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Laminating line gluing, curing, pressing	OAC rule 3745-31-05(C)	Permit to Install 02-22249 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3): <ol style="list-style-type: none"> a. volatile organic compounds (VOC) shall not exceed 0.017 pound of VOC per gallon of adhesive, excluding water and exempt solvents, on a daily volume-weighted average; and

b. adhesive usage shall not exceed 113,880 gallons per rolling, 12-month period.

See sections A.2.b and B.1 below.

See section A.2.a below.

OAC rule 3745-21-07(G)(2)

2. Additional Terms and Conditions

- (a) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

The VOC content shall not exceed 0.017 pound of VOC per gallon of adhesive, excluding water and exempt solvent(s), on a daily volume-weighted average, for all adhesives.

B. Operational Restrictions

1. The permittee shall not use more than 166,346 gallons of adhesive per rolling, 12-month period.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
- the company identification for each organic compound material employed; and
 - documentation on whether or not each organic compound employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for this emissions unit:
- the name and identification number of each adhesive coating, as applied; and
 - the VOC content of each adhesive coating (excluding water and exempt solvents), as applied.
3. The permittee shall collect, record and calculate the following information monthly for this emissions unit:
- the name and identification number of each adhesive coating used;
 - the VOC content (excluding water and exempt solvents), in pounds per gallon, of each adhesive coating;
 - the total number of gallons (excluding water and exempt solvents) of each adhesive coating used for the month;
 - the total monthly VOC emissions from this line, i.e., the summation of (b) times (c) for all adhesive coatings employed; and
 - the rolling, 12-month summation of the adhesive coating usage in gallons each month.

D. Reporting Requirements

- The permittee shall notify the Director (Ohio EPA, Northeast District Office), in writing of any daily record showing that photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
- The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any monthly record showing the use of noncomplying adhesive coatings. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days following the end of the calendar month.
- The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any record for this line showing exceedances of the rolling, 12-month adhesive coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
- 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.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

The VOC content shall not exceed 0.017 pound of VOC per gallon of adhesive, excluding water and exempt solvent(s), on a daily volume-weighted average, for all adhesives.

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to

section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:

The permittee shall not use more than 113,880 gallons of adhesive per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records for the calendar year from the record keeping requirement specified in section C.3.e.

F. **Miscellaneous Requirements**

1. None