

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.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

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"> <li>a. volatile organic compounds (VOC) shall not exceed 0.117 pound of VOC per gallon of adhesive, excluding water and exempt solvents, on a daily volume-weighted average; and</li> <li>b. adhesive usage shall not exceed 166,346 gallons per rolling, 12-month period.</li> </ol> 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 0.117 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:
  - 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 (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 limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
The VOC content shall not exceed 0.117 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 166,346 gallons of adhesive per rolling, 12-month period.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated 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