



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

12/27/2011

Mr. Clark Buckles
RJF INTERNATIONAL CORPORATION
700 BF Goodrich Ave.
Marietta, OH 45750

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0684020020
Permit Number: P0107108
Permit Type: Initial Installation
County: Washington

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-SEDO



Response to Comments

Facility ID:	0684020020
Facility Name:	RJF INTERNATIONAL CORPORATION
Facility Description:	Vinyl film and wallcovering and vinyl matting plant.
Facility Address:	BF GOODRICH RD. MARIETTA, OH 45750 Washington County
Permit:	P0107108, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Marietta Times on 11/16/2011. The comment period ended on 12/16/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

- a. Comment: No comments received regarding this Draft permit.
- b. Response: None



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
RJF INTERNATIONAL CORPORATION**

Facility ID:	0684020020
Permit Number:	P0107108
Permit Type:	Initial Installation
Issued:	12/27/2011
Effective:	12/27/2011
Expiration:	12/27/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
RJF INTERNATIONAL CORPORATION

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 10
1. K015, Print/Laminate/Emboss Line (4 Station)..... 11
2. K016, New Print/Laminate/Emboss Line (6 Station)..... 20



Authorization

Facility ID: 0684020020

Application Number(s): A0040521

Permit Number: P0107108

Permit Description: This permit is for the installation and operation of two new print/laminate/emboss lines. One line will consist of a four station printer and the other line will consist of a six station printer. Both lines will have inline adhesive lamination following the ink coating portions of the process. The new lines will be similar to existing printing & laminating/embossing lines except that the new lines will consist of both operations (utilizing simultaneous ink and adhesive application at different sections of the operation).

Permit Type: Initial Installation

Permit Fee: \$400.00

Issue Date: 12/27/2011

Effective Date: 12/27/2011

Expiration Date: 12/27/2016

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

RJF INTERNATIONAL CORPORATION
BF GOODRICH RD.
MARIETTA, OH 45750

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107108

Permit Description: This permit is for the installation and operation of two new print/laminate/emboss lines. One line will consist of a four station printer and the other line will consist of a six station printer. Both lines will have inline adhesive lamination following the ink coating portions of the process. The new lines will be similar to existing printing & laminating/embossing lines except that the new lines will consist of both operations (utilizing simultaneous ink and adhesive application at different sections of the operation).

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K015
Company Equipment ID:	Print/Laminate/Emboss Line (4 Station)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	K016
Company Equipment ID:	Print/Laminate/Emboss Line (6 Station)
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. 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).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.3.
2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart FFF: K015, K016. The complete NSPS requirements, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
3. The restricted VOC usage/emission limitations specified in C.1.c)(2)., in turn, restrict the Hazardous Air Pollutant (HAP) emissions from emissions units K003, K004, K005, K007, K008, K011, K012, K013, K015, and K016. The restricted HAP emissions from these emissions units were added to the HAP potential to emit emissions for all other sources at the facility. Using this approach, the HAP emissions will not exceed the individual and combined HAP emission thresholds of 10 and 25 tons/respectively. Therefore, no additional terms and conditions are necessary to further restrict the HAP emissions from this facility (see 4.).
4. Based on information provided by the permittee, the facility Potential to Emit (PTE) for HAPs is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings used. If any changes in the operations and/or coating formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.

C. Emissions Unit Terms and Conditions



1. **K015, Print/Laminate/Emboss Line (4 Station)**

Operations, Property and/or Equipment Description:

Print/Laminate/Emboss Line (4 Station, with natural gas dryer).21.6 gallons ink/hr, 10.8 gallons adhesive/hr (includes vinyl, fabric, and paper printing)

a) 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. g)(1)

(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. b)(1)d.

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.	ORC 3704.03(T)	The requirements of this rule include the requirements of OAC Rule 3745-21-09(F)(1),(G) and (H).
b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	Nitrogen Oxide (NOx) emissions shall not exceed 0.98 lb per hour and 4.29 tons per year. Carbon Monoxide (CO) emissions shall not exceed 0.82 lb per hour and 3.61 tons per year. See b)(2)a. and b)(2)c. below
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below

d.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V applicability)	VOC emissions for K003, K004, K005, K007, K008, K011, K012, K013, K015, and K016, combined, shall not exceed 50.0 tons, based upon a rolling, 12-month summation. See b)(2)c. below
e.	40 CFR Part 60, Subpart FFF [In accordance with 40 CFR 60.580(a), the affected facility to which the provisions of this subpart apply is each rotogravure printing line used to print or coat flexible vinyl or urethane products. This emission unit is subject to the emissions limitations/controls measures specified in this section.]	The weighted average VOC content of all inks employed on this emissions unit shall be less than 1.0 kilogram VOC per kilogram of solids.
f.	OAC rule 3745-21-09(H)	The requirements of this rule are equivalent to ORC 3704.03(T). The Volatile Organic Compound (VOC) content of the coatings employed in the line, shall not exceed the following limitation: 4.8 pounds of VOC per gallon of vinyl coating, excluding water and exempt solvents.
g.	OAC rule 3745-17-10 (B)	PE from the dryer shall not exceed 0.020lb per mmBtu of actual heat input.
h.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
i.	OAC 3745-21-09 (F)(1)	The requirements of this rule are equivalent to ORC 3704.03(T) The Volatile Organic Compound (VOC) content of the coatings employed in the line, shall not exceed the following limitation: 2.9 pounds of VOC per gallon of paper or fabric coating, excluding water and exempt solvents.

j.	OAC 3745-21-09 (G)	<p>The requirements of this rule are equivalent to ORC 3704.03(T)</p> <p>The Volatile Organic Compound (VOC) content of the coatings employed in the line, shall not exceed the following limitation:</p> <p>2.9 pounds of VOC per gallon of paper or fabric coating, excluding water and exempt solvents.</p>
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(2) Additional Terms and Conditions

a. The permittee has satisfied the Best available Technology (BAT) requirements pursuant to OAC rule 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 regulation for NAAQS pollutant emissions 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 revision to OAC rule 3745-31-05, the requirement 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx and CO emissions from this air contaminant source since the uncontrolled potential to emit for NOx and CO is less than 10 tons/yr.

c) Operational Restrictions

(1) The permittee shall only burn natural gas as fuel for the dryer in this emissions unit.

(2) The maximum annual volatile organic material usage from coatings (including inks and adhesives) and cleanup materials for emissions units K003, K004, K005, K007, K008, K011, K012, K013, K015, and K016, combined, shall not exceed 50.0 tons, based upon a rolling, 12-month summation of the volatile organic material usage figures. The permittee shall comply with this limitation upon issuance of this permit through the use of past operating records.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a monthly basis for emissions units K003, K004, K005, K007, K008, K011, K012, K013, K015, and K016:
 - a. the name and identification of each coating (including inks and adhesives) and cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC content of each coating (including inks and adhesives), in pounds per gallon;
 - e. the VOC content of each coating (including inks and adhesives), in pounds per gallon, excluding water and exempt solvents;
 - f. the number of gallons of each coating employed;
 - g. the total VOC emission from all coatings (including inks and adhesives) and cleanup materials employed, in tons (i.e., the summation of the values from b x c + the summation of the values from d x f); and,
 - h. the rolling, 12-month summation of VOC emission from all coatings (including inks and adhesives) and cleanup materials employed, in tons.
- (2) The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. the name and identification of each coating (including inks), and cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC content of each coating (including inks), in pounds per gallon, excluding water and exempt solvents;
 - e. the VOC content of each ink, in kilograms per kilogram of ink solids;
 - f. the number of gallons of each coating (including inks) employed; and the type of material coated (vinyl, paper, or fabric);
 - g. the total VOC emissions from all cleanup materials employed, in tons; and
 - h. the total emissions from all coating (including inks and adhesives) and clean up materials employed, in tons (i.e the summation of the values from b x c + the summation from d x f).

- (3) For each day during which the permittee burns a fuel other than natural gas in the dryer, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (4) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:
- the name and identification number of each coating, as applied; and
 - the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific [gallons/year] and/or [tons/year] limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (5) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart FFF, including the following sections:

60.583(b)(1)-(5)	Determining weighted average VOC content of the inks.
60.583(c)(1)-(5)	Demonstrate compliance with weighted average VOC content using inventory system.

e) Reporting Requirements

- (1) Unless other arrangements have been made by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart FFF, including the following sections:

60.583(b)(4)	Determination of the weighted average.
60.585(a)	Reporting of performance test results.
60.585(b)(1)	Semi annual report of weighted average exceedance.
60.585(c)	Postmark requirement.

f) Testing Requirements

- (1) Compliance with the allowable emission limits in section b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitation:

The VOC coating in this line shall not exceed 4.8 pounds of VOC per gallon of vinyl coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping requirements of d)(2)d.

b. Emissions Limitation:

The maximum annual volatile organic material usage from coatings (including inks and adhesives) and cleanup materials for emissions units K003, K004, K005, K007, K008, K011, K012, K013, K015, and K016, combined, shall not exceed 50.0 tons, based upon a rolling, 12-month summation of the volatile organic material usage figures. The permittee shall comply with this limitation upon issuance of this permit through the use of past operating records.

Applicable Compliance Method:

Compliance with the combined annual VOC emission limitation shall be demonstrated through the record keeping requirement of d)(1)h.

c. Emissions Limitation:

The weighted average VOC content of all inks employed on this emissions unit shall be less than 1.0 kilogram VOC per kilogram of solids.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping requirement of d)(2)e.

d. Emissions Limitations:

NOx emissions shall not exceed 0.98 lbs per hour and 4.29 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the manufacturer supplied emission factor of 0.98 lb/ hr (8,760 hrs/yr) / 2,000 lbs/ton

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

e. Emissions Limitations:

CO emissions shall not exceed 0.82 lb per hour and 3.61 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the manufacturer supplied emission factor of 0.82 lb/ hr (8,760 hrs/yr) / 2,000 lbs/ton

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

f. Emissions Limitation:

PE from the dryer shall not exceed 0.020lb per mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon the emission factor of 7.6 / lb/10⁶scf (AP 42 table 1.42, 7/98) Divided by 1,020 to determine lb per mmBtu which is equated to 0.007.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources, and the procedures specified in OAC rule 3745-17-03(B)(10) ". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.



g. Emissions Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

The VOC coating in this line shall not exceed 2.9 pounds of VOC per gallon of paper or fabric coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping requirements of d)(1).

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC contents of inks and cleanup materials. The results of the most recent bench scale tests, conducted by the permittee, shall be used to determine the VOC content of the adhesives.

(3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart FFF, including the following sections:

60.583(a)(1)-(6)	Methods to determine compliance.
60.583(b)(1)-(5)	Determine weighted average VOC content of the ink.
60.583(c)(1)-(5)	Determine weighted average of VOC content using an inventory system.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install and operate prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new material, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install and operate.



2. K016, New Print/Laminate/Emboss Line (6 Station)

Operations, Property and/or Equipment Description:

Print/Laminate/Emboss Line (6 Station, with natural gas dryer).32.40 gallons ink/hr, 10.8 gallons adhesive/hr (includes vinyl, fabric, and paper printing)

a) 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. g)(1)

(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. b)(1)d.

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.

Table with 3 columns: Row Label, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists specific rules like ORC 3704.03(T) and OAC rule 3745-31-05 (A)(3) with their corresponding emission limits for NOx and CO.

d.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V applicability)	VOC emissions for K003, K004, K005, K007, K008, K011, K012, K013, K015, and K016, combined, shall not exceed 50.0 tons, based upon a rolling, 12-month summation. See b)(2)c. below
e.	40 CFR Part 60, Subpart FFF [In accordance with 40 CFR 60.580(a), the affected facility to which the provisions of this subpart apply is each rotogravure printing line used to print or coat flexible vinyl or urethane products. This emission unit is subject to the emissions limitations/controls measures specified in this section.]	The weighted average VOC content of all inks employed on this emissions unit shall be less than 1.0 kilogram VOC per kilogram of solids.
f.	OAC rule 3745-21-09(H)	The requirements of this rule are equivalent to ORC 3704.03(T) The Volatile Organic Compound (VOC) content of the coatings employed in the line, shall not exceed the following limitation: 4.8 pounds of VOC per gallon of vinyl coating, excluding water and exempt solvents.
g.	OAC rule 3745-17-10 (B)	PE from the dryer shall not exceed 0.020lb per mmBtu of actual heat input.
h.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
i.	OAC 3745-21-09 (F)(1)	The requirements of this rule are equivalent to ORC 3704.03(T) The Volatile Organic Compound (VOC) content of the coatings employed in the line, shall not exceed the following limitation: 2.9 pounds of VOC per gallon of paper or fabric coating, excluding water and exempt solvents.

j.	OAC 3745-21-09 (G)	<p>The requirements of this rule are equivalent to ORC 3704.03(T)</p> <p>The Volatile Organic Compound (VOC) content of the coatings employed in the line, shall not exceed the following limitation:</p> <p>2.9 pounds of VOC per gallon of paper or fabric coating, excluding water and exempt solvents.</p>
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(2) Additional Terms and Conditions

a. The permittee has satisfied the Best available Technology (BAT) requirements pursuant to OAC rule 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 regulation for NAAQS pollutant emissions 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 revision to OAC rule 3745-31-05, the requirement 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 OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx and CO emissions from this air contaminant source since the uncontrolled potential to emit for NOx and CO is less than 10 tons/yr.

c) Operational Restrictions

(1) The permittee shall only burn natural gas as fuel for the dryer in this emissions unit.

(2) The maximum annual volatile organic material usage from coatings (including inks and adhesives) and cleanup materials for emissions units K003, K004, K005, K007, K008, K011, K012, K013, K015, and K016, combined, shall not exceed 50.0 tons, based upon a rolling, 12-month summation of the volatile organic material usage figures. The permittee shall comply with this limitation upon issuance of this permit through the use of past operating records.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a monthly basis for emissions units K003, K004, K005, K007, K008, K011, K012, K013, K015, and K016:
 - a. the name and identification of each coating (including inks and adhesives) and cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC content of each coating (including inks and adhesives), in pounds per gallon;
 - e. the VOC content of each coating (including inks and adhesives), in pounds per gallon, excluding water and exempt solvents;
 - f. the number of gallons of each coating employed;
 - g. the total VOC emission from all coatings (including inks and adhesives) and cleanup materials employed, in tons (i.e., the summation of the values from b x c + the summation of the values from d x f); and,
 - h. the rolling, 12-month summation of VOC emission from all coatings (including inks and adhesives) and cleanup materials employed, in tons.
- (2) The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. the name and identification of each coating (including inks), and cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC content of each coating (including inks), in pounds per gallon, excluding water and exempt solvents;
 - e. the VOC content of each ink, in kilograms per kilogram of ink solids;
 - f. the number of gallons of each coating (including inks) employed; and the type of material coated (vinyl, paper, or fabric);
 - g. the total VOC emissions from all cleanup materials employed, in tons; and
 - h. the total emissions from all coating (including inks and adhesives) and clean up materials employed, in tons (i.e the summation of the values from b x c + the summation from d x f).

- (3) For each day during which the permittee burns a fuel other than natural gas in the dryer, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (4) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:
- the name and identification number of each coating, as applied; and
 - the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific [gallons/year] and/or [tons/year] limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (5) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart FFF, including the following sections:

60.583(b)(1)-(5)	Determining weighted average VOC content of the inks.
60.583(c)(1)-(5)	Demonstrate compliance with weighted average VOC content using inventory system.

e) Reporting Requirements

- (1) Unless other arrangements have been made by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart FFF, including the following sections:

60.583(b)(4)	Determination of the weighted average.
60.585(a)	Reporting of performance test results.
60.585(b)(1)	Semi annual report of weighted average exceedance.
60.585(c)	Postmark requirement.

f) Testing Requirements

- (1) Compliance with the allowable emission limits in section b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitation:

The VOC coating in this line shall not exceed 4.8 pounds of VOC per gallon of vinyl coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping requirements of d)(2)d.

b. Emissions Limitation:

The maximum annual volatile organic material usage from coatings (including inks and adhesives) and cleanup materials for emissions units K003, K004, K005, K007, K008, K011, K012, K013, K015, and K016, combined, shall not exceed 50.0 tons, based upon a rolling, 12-month summation of the volatile organic material usage figures. The permittee shall comply with this limitation upon issuance of this permit through the use of past operating records.

Applicable Compliance Method:

Compliance with the combined annual VOC emission limitation shall be demonstrated through the record keeping requirement of d)(1)h.

c. Emissions Limitation:

The weighted average VOC content of all inks employed on this emissions unit shall be less than 1.0 kilogram VOC per kilogram of solids.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping requirement of d)(2)e.

d. Emissions Limitations:

NOx emissions shall not exceed 1.37 lbs per hour and 6.01 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the manufacturer supplied emission factor of 1.37 lb/ hr (8,760 hrs/yr) / 2,000 lbs/ton

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

e. Emissions Limitations:

CO emissions shall not exceed 1.15 lb per hour and 5.05 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the manufacturer supplied emission factor of 1.15 lb/ hr (8,760 hrs/yr) / 2,000 lbs/ton

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

f. Emissions Limitation:

PE from the dryer shall not exceed 0.020lb per mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon the emission factor of 7.6 / lb/10⁶scf (AP 42 table 1.42, 7/98) Divided by 1,020 to determine lb per mmBtu which is equated to 0.007.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources, and the procedures specified in OAC rule 3745-17-03(B)(10) ". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g. Emissions Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emissions Limitation:

The VOC coating in this line shall not exceed 2.9 pounds of VOC per gallon of paper or fabric coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping requirements of d)(1).

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC contents of inks and cleanup materials. The results of the most recent bench scale tests, conducted by the permittee, shall be used to determine the VOC content of the adhesives.
- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart FFF, including the following sections:

60.583(a)(1)-(6)	Methods to determine compliance.
60.583(b)(1)-(5)	Determine weighted average VOC content of the ink.
60.583(c)(1)-(5)	Determine weighted average of VOC content using an inventory system.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the “Toxic Air Contaminant Statute” in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install and operate prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new material, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install and operate.