



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
TRUMBULL COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-22249

Fac ID: 0278000800

DATE: 12/5/2006

Pittsburgh Forest Products
Mark A. Spence
P.O. Box 153 19 North Center St.
Corry, PA 16407

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

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

You are hereby notified that this action of the Director is final 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 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

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 12/5/2006
Effective Date: 12/5/2006**

FINAL PERMIT TO INSTALL 02-22249

Application Number: 02-22249
Facility ID: 0278000800
Permit Fee: **\$800**
Name of Facility: Pittsburgh Forest Products
Person to Contact: Mark A. Spence
Address: P.O. Box 153 19 North Center St.
Corry, PA 16407

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1330 Ridge Rd.
Vienna, Ohio**

Description of proposed emissions unit(s):
Woodworking equipment, coating line.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

Pittsburgh Forest Products
PTI Application: 02-22249
Issued: 12/5/2006

Facility ID: 0278000800

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

Pittsburgh Forest Products
PTI Application: 02-22249
Issued: 12/5/2006

Facility ID: 0278000800

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

Pittsburgh Forest Products
PTI Application: 02-22249
Issued: 12/5/2006

Facility ID: 0278000800

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
Volatile Organic Compounds (VOC)	20.0
Particulate Emissions (PE)	23.0

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (F001) - woodworking dust collection system saws, sanders, brush cleaners

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	See A.2.a, A.2.b, A.2.c , and B.1 below.
OAC rule 3745-17-08(B)(3)(b)	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).
OAC rule 3745-17-07(B)(1)	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

- 2.a Particulate emissions/ PM10 shall not exceed 3.0 pounds per hour and 13.0 tons per year from the dust collector exhaust.
- 2.b Visible particulate emissions from the dust collector exhaust shall not exceed 10% opacity, as a 3-minute average.
- 2.c Visible fugitive particulate emissions 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 Recordkeeping Requirements

Issued: 12/5/2006

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

Emissions Unit ID: **F001**

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 limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. 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.

- b. Emission Limitation:

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

Issued: 12/5/2006

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.

c. Emission Limitation:

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

Issued: 12/5/2006

Applicable Compliance Methods:

If required compliance shall be determined according to OAC rule 3745-17-03(B)(10), (Method 5, 40 CFR 60, Appendix A).

- d. Emission Limitation:
PE/PM10 emissions shall not exceed 13.0 tons per year.

Applicable Compliance Methods:

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

$$600 \text{ lbs./hr} \times (.99) \times (1-.99.5) \times 8760 \text{ hr/yr} \times 1 \text{ ton/ } 2000 \text{ lbs}$$

Where:

600 lbs/hr is the wood waste generated as listed in the permit to install application;
99 % is the estimated capture efficiency of hoods, etc.; and
99.5 % is the estimated dust collector control efficiency.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (F002) - dust collection system for sawing operation w/ baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	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.
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 twenty- percent opacity as a three minute average, except as provided by the rule.

2. **Additional Terms and Conditions**

- 2.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 Recordkeeping 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

Issued: 12/5/2006

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 Unit ID: **F002**

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 limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. 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.

- b. 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

Issued: 12/5/2006

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.

c. 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 as listed in OAC Rule 3745-17-03(B)(10).

d. Emission Limitation:

PE/PM10 emissions shall not exceed 10.0 tons per year.

Applicable Compliance Methods:

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

$$0.03 \text{ gr/dscf} \times 4500 \text{ dscf/hr} \times 1 \text{ lb/7000 gr} \times 60 \text{ min/hr} = 1.16 \text{ lbs/hr}$$

$$1.16 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs} = 5.1 \text{ TPY}$$

Where:

0.03 is the maximum grain loading of the exhaust stack;
4500 dscf/ hr is the maximum exhaust flow rate from the application.; and
8760 hrs/yr is the maximum annual number of hours of operation.

F. Miscellaneous Requirements

None

Issued: 12/5/2006

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K001) - Lay-up line glue roll, plywood press

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the uncontrolled potential to emit for VOC is less than ten tons per year.
OAC rule 3745-21-07(G)(2)	See A.2.a. below
OAC rule 3745-31-02(A)	Volatile organic compounds (VOC) shall be less than 10.0 tons/yr. (See A.2.b. and B.1)

2. Additional Terms and Conditions

- 2.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.

- 2.b The volatile organic compound (VOC) content shall not exceed 0.017 pounds 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 Recordkeeping 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

Issued: 12/5/2006

1. The permittee shall notify the Director, 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 which 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(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

The VOC content shall not exceed 0.017 lbs VOC/gallon coating, excluding water and exempt solvents.

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 4.3 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

Emissions Unit ID: **K001**

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.

b. Emission Limitation:

The VOC emissions shall not exceed 10.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.3.

F. Miscellaneous Requirements

None

Issued: 12/5/2006

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K002) - Laminating line gluing, curing, pressing

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC) from this air contaminant source since the uncontrolled potential to emit for VOC is less than ten tons per year.
OAC rule 3745-21-07(G)(2)	See A.2.a. below
OAC rule 3745-31-02(A)	Volatile organic compounds (VOC) shall be less than 10.0 tons/yr. (See A.2.b. and B.1)

2. Additional Terms and Conditions

- 2.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.

- 2.b The volatile organic compound (VOC) content shall not exceed 0.117 pounds of VOC per gallon of adhesive, excluding water and exempt solvent(s), on a daily volume-weighted average, for all adhesives.

Issued: 12/5/2006

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 Recordkeeping 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, 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 which 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(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

The VOC content shall not exceed 0.117 lbs VOC/gallon coating, excluding water and exempt solvents.

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 4.3 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

Issued: 12/5/2006

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.

b. Emission Limitation:

The VOC emissions shall not exceed 10.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.3.

F. Miscellaneous Requirements

None