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

6/15/2012

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

Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Avery Dennison MFD, Bldg 7
Facility ID: 0243111361
Permit Type: Renewal
Permit Number: P0085048

Dear Ms. Blakley:

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

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Northeast District Office

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

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Ohio | Environmental Protection Agency

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Avery Dennison MFD, Bldg 7

Facility ID:	0243111361
Permit Number:	P0085048
Permit Type:	Renewal
Issued:	6/15/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Avery Dennison MFD, Bldg 7

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Authorization

Facility ID: 0243111361
Facility Description: Paper coating lines
Application Number(s): A0015657
Permit Number: P0085048
Permit Description: Title 5 Renewal Permit for Avery Dennison, MFD, B#7: Two Coaters, Compounding Mixers & Weigh Stations
Permit Type: Renewal
Issue Date: 6/15/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0085047

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

Avery Dennison MFD, Bldg 7
Avery Dennison
7590 Auburn Road
Painesville, OH 44077

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

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

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

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

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

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

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

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

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

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

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

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

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

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

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

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

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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

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

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

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

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

25. Records Retention RequirementsUnder State Law Only

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

26. Inspections and Information Requests

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

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

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. 40 CFR Part 63, Subpart JJJJ MACT Requirements

   The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJ: K001 and K002.

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

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

4. This Title V permit is one of three Title V permits that cover the Avery Dennison Facilities located on Chester Street in Painesville, Ohio of Lake County. The three are classified presently as follows:

   Avery MFD, Reflective Division, Building # 7; (02 43 11 1361)

   Avery PFF, the P-coaters, Building # 3; (02 43 11 1416)

   Avery STD, the I-coaters, Building # 5; (02 43 11 1362)

   This permit is for the first listing, Avery MFD, Reflective Division, Building # 7 (02 43 11 1361).

   K001 (R-1 coater) at this facility is part of a netting, synthetic minor permit to install (#02-8665), issued January 19, 1995, with K015 (P-7) located at Avery PFF, and the following is the synthetic minor determination which was included in permit to install # 02-8665.

   The permittee proposed to install K015 (the P-7 pressure sensitive adhesive coater) at their Chester Street facility in Painesville, Ohio.

   At the time of the proposed installation, Lake County was non attainment for ozone. Since the proposed potential emissions from the new coater (K015) exceeded 40 tons per year and the facility was a major source, the installation of the new coater would have been a major modification and would have required a source to comply with the Emission Offset Interpretation Policy (40 CFR, Part 51, Appendix S). Through the netting process, the permittee was able to avoid these requirements.

   The permittee proposed to restrict the annual VOC content of the coatings applied on line K015 to 6,550 tons per year by accepting monthly cumulative emission limitations in the first year and an annual rolling 365-day summation in subsequent years, such that the annual VOC emissions, including total organic HAP emissions, would not exceed 131 tons per year. Due to the wide variety of coatings and products and the unpredictable nature of the operation, this would be tracked and enforced through daily record keeping and quarterly reporting of coating usage and emissions.

The permittee also proposed to limit the emissions from K001 (the R-1 Reflective Coater) to 153 tons of VOC per year. The old allowable emission rate for K001 was 290.78 tons of VOC per year. (The allowable emission rate was used because it was less than the actual emission rate. K001 had been part of a federally approved bubble with three other coaters at the facility. These four emissions units, in total, had complied with the 2.9 pounds of VOC per gallon of coating [excluding water and exempt solvents] RACT limitation.)

To accomplish the emission reductions, K001 was equipped with a thermal oxidizer (later replaced with a regenerative thermal oxidizer (RTO) with greater efficiency for reduction of VOCs) with an overall reduction efficiency of at least 88.7%. Further, the coating usage in K001 was restricted to no more than 1,354 tons per year through PTI # 02-8665.

Two other contemporaneous emission increases at the facility included the installation of a pilot coater (emissions unit K014) and the I-5 coating line (emissions unit K016) at Avery Specialty Tape Division, STD).

Permit to install 02-4109 (issued on July 31, 1989 and modified on February 2, 1992) allowed the pilot coater (Ohio EPA facility number 02 43 11 1362 K014) to emit 6.75 tons of VOC per year.

Permit to install 02-7206 (issued on June 16, 1994) allows the I-5 coater (Ohio EPA facility number 02 43 11 1362 K016) to emit up to 39.0 tons of VOC per year.

The following table summarizes the netting:

K001 (R-1) allowable emissions (prior to installation of incinerator/RTO, in tons/year)	290.78
K001 (R-1) allowable emissions (after installation of incinerator/RTO, in tons/year)	153.0
K001 (R-1) contemperoraneous decrease, in tons	- 137.78
K014 (pilot coater) contemporaneous increase, in tons	6.75
K016 (I-5 coater) contemporaneous increase, in tons	39.0
K015 (P-7) potential to emit (with enforceable operating restrictions), in tons	131.00
NET EMISSIONS INCREASE, IN TONS	38.97

Therefore, because the net emissions increase was less than 40 tons per year, the installation of K015 was not considered a major modification under the definition of 40 CFR, Part 51.

In addition, the allowable emission rate for emissions unit K001 is 153 tons per year on a rolling, 365-day basis.

C. Emissions Unit Terms and Conditions

1. K001, R-1 Coater

Operations, Property and/or Equipment Description:

R-1 coater - pressure sensitive coater, drying ovens & R-1 corona treater with regenerative thermal oxidizer (RTO) shared with R-2, Building #7

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(F)(1) and OAC rule 3745-21-09(B)(6)	The overall volatile organic compound (VOC) emission reduction efficiency requirements specified by these rules are less stringent than the efficiency requirements of OAC rule 3745-21-09(F)(2)(a).
b.	OAC rule 3745-21-09(F) and OAC rule 3745-21-09(F)(2)(a)	The permittee shall maintain a 90% overall VOC reduction efficiency, by weight, (with 100% capture efficiency accomplished through the use of permanent total enclosure (PTE) and at least a 90% destruction efficiency through the use of an RTO.
c.	OAC rule 3745-21-09(F)(2)(b)	See c)(11).
d.	OAC rule 3745-31-05(D) (PTI 02-8665) This emissions unit has been netted with P-7, Ohio EPA emissions unit K015 of PFF of Avery, Building #3.	The overall reduction efficiency for VOCs from PTI 02-8665 is less stringent than the overall reduction efficiency for VOCs required by OAC rule 3745-21-09(F)(2)(a). VOC emissions shall not exceed 153 tons per year on a rolling, 365-day basis, including total organic hazardous air pollutants (HAP).

e.	40 CFR Part 63, DDDDD (Boiler MACT)	See b)(2)c.
f.	40 CFR Part 63, Subpart JJJJ	The permittee shall maintain a 95% overall organic HAP reduction efficiency, (with a 100% capture efficiency accomplished through the use of a permanent total enclosure (PTE) and at least a 95% destruction efficiency through the use of an RTO). See b)(2)d. See e)(8).

(2) Additional Terms and Conditions

a. The annual mass VOC emission limitation of 153 tons per year on a rolling, 365-day basis, including total organic HAP for this emissions unit is based on a maximum potential coating usage of 1354 tons per year.

b. VOC emissions shall include all organic HAP/HAPs emissions.

c. The natural gas fuel fired oven burners/heaters for process heat associated with this emissions unit are small gaseous fuel fired process heaters with heat input ratings below 10 mmBtu/hr.

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

d. Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR 63.3330, the source must limit organic HAPs emissions from the affected source to:

i. no more than 5 percent of the organic HAPs applied for each month (95 percent reduction); or

ii. no more than 4 percent of the mass of coating materials applied for each month; or

iii. no more than 20 percent of the mass of coating solids applied for each month; or

iv. thepermittee shall operate (if an oxidizer is used) the oxidizer such that an outlet organic HAPs concentration of no greater than 20 ppmv by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

c) Operational Restrictions

(1) Coatings that contain solvent shall not be employed in this emissions unit without the beneficial use of the regenerative thermal oxidizer (RTO).

(2) The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation and employing coatings, shall not be less than the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The minimum allowable operating temperature based on a 3-hour average for the RTO serving this emissions unit has been established at 1497 degrees Fahrenheit, based on an emissions testing report dated November 2, 2011.

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

(3) The RTO control system shall be designed and operated according to good engineering practices and the manufacturer's specifications, including any lower explosive limit (LEL) monitors in any RTO bypass ducts. (LEL monitors are monitors that are set at a concentration point and when the concentration gets to the set level, shutdown or an alarm may occur in order to avoid flammability and/or explosion.)

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

(4) The LEL monitors that are used to signal inappropriate bypass use for nonemergency solvent coatings, shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

(5) The permittee shall limit coating usage to 1354 tons per year, or whatever amount of coating limitation is necessary, so that the amount of VOC emitted is no more than 153 tons of VOC, including total organic HAP, per rolling, 365 day period, according to PTI 02-8665 netting restrictions unless otherwise determined by Ohio EPA.

Since the 2007 though 2010 annual VOC emissions including total organic HAP, based on Fee Emission Reports, from this emissions unit have consistently been less than 10 tons of reportable air contaminants, the permittee may record and maintain an annual emission rate of VOCs instead of the rolling, 365-day summation and correspondingly an annual coating usage rate. In the event that the emission rate exceeds 10% of the 153 ton rolling, 365-day allowable, then Avery shall return to recording and maintaining a 365 day, rolling summation of VOC emissions and coating usage.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI # 02-8665]

(6) The coating line shall be vented to the RTO during all coating operations.

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

(7) The permittee shall use the bypass of the RTO for emergency purposes, only. Solvent containing coatings, employed in this emissions unit, shall not be vented through the bypass of the RTO, except during emergency situations.

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

(8) Based on the application for this emissions unit, this coating line shall be enclosed such that 100% of all VOC emissions, including total organic HAP emissions, are captured, contained and vented to the RTO. Compliance with the following criteria, identified by USEPA Method 204 of 40 CFR Part 51, Appendix M, shall be met by the permittee:

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

b. The total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

c. The average facial velocity (FV) of air through all NDOs shall be at least 3,600 meters/hr (200 fpm); the corresponding pressure drop, if applicable, shall be at least 0.007 inches of water, as described in Method 204. The direction of air flow through all NDOs shall be into the enclosure.

d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

e. All VOC emissions, including total organic HAP emissions, must be captured and vented to the RTO.

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

(9) When the emissions unit is in operation, the permanent total enclosure shall be maintained under negative pressure at all times during routine operations. Routine operations shall include all operations except those that require an employee to briefly enter the enclosure for quick cleaning, quality control, or coating change.

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

(10) The concentrations of VOC emissions, including total organic HAP emissions, measured in accordance with the leak monitoring program for the permanent enclosure shall not exceed 100 ppm, by volume.

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

(11) **Work practice standards for cleaning materials**

Unless emissions to the atmosphere are controlled by an approved emission control system with an overall control efficiency of at least ninety per cent, any person using an organic solvent for cleanup shall:

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

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

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

c. minimize spills of VOC-containing cleaning materials;

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

e. minimize VOC emissions, including total organic HAP emissions, from cleaning storage, mixing, and conveying equipment.

The permittee shall post copies of these requirements around dip tanks and storage tanks, conduct training about these requirements, along with managerial audits and checks at variable frequencies and/or other means of continuing compliance.

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was less than the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;

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

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

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

(2) The permittee shall collect and record the following information daily for all coatings applied in this emissions unit and the cleanup materials associated with those coatings:

a. the name and identification number of each coating, as applied;

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

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

d. the name and identification number of each cleanup material employed;

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

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

g. the total uncontrolled VOC emissions, including total organic HAP emissions, from all coatings applied, in tons (equals VOC applied);

h. the total uncontrolled VOC emissions, including total organic HAP emissions, from all cleanup materials, in tons;

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

j. the total VOC emission rate, i.e., controlled VOC emissions, including total organic HAP emissions, from all coatings plus uncontrolled emissions from all cleanup materials, in tons.

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

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

a. the name and identification number of each coating, as applied;

b. the total organic HAPs content of each coating in pounds per gallon of coating, as applied;

c. the number of gallons of each coating applied;

d. the name and identification number of each cleanup material employed;

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

f. the total organic HAPs content of each cleanup material, in pounds per gallon;

g. the total uncontrolled organic HAPs emissions from all coatings applied, in tons (equals organic HAPs applied);

h. the total uncontrolled organic HAPs emissions from all cleanup materials, in tons;

i. the calculated, controlled total organic HAPs emission rate for all coatings, in tons (the controlled total organic HAPs emission rate for the coatings shall be calculated using the overall control efficiency for the control equipment determined during the most recent emission test that demonstrated that the emissions unit was in compliance); and

j. the total organic HAPs emission rate, i.e., controlled total organic HAPs emissions from all coatings plus uncontrolled emissions from all cleanup materials, in tons.

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

(4) The permittee shall also record the following information daily:

a. if required, the rolling, 365-day summation of the total VOC emissions, including organic HAPs from all the coatings applied, i.e., d)(2)j and d)(3)j, in tons; and

b. if required, the rolling, 365-day summation of the total VOC applied, including organic HAPs i.e., d)(2)g + d)(3)g, in tons.

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

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

a. the monthly sum of the total daily VOC emissions (including organic HAPs) from this emissions unit, i.e., the monthly sum of the daily values from d)(2)j + d)(3)j.;

b. the cumulative, year-to-date, VOC and organic HAPs emissions for the calendar year, in tons.

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

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

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

(7) Each day, the permittee shall inspect the permanent enclosure to ensure that the following conditions are being maintained:

a. all access doors and windows that are not natural draft openings are closed;

b. all velcro closures (if employed) are intact; and

c. the direction of air is inward as shown by streamers, smoke tubes, or tracer gases and/or by ensuring that all component curtains curve inward.

The permittee shall also perform weekly velocity or pressure drop measurements for the permanent enclosure to ensure that the ventilation rate through all natural draft openings is maintained at 200 feet per minute or greater or the corresponding pressure drop, as described in Method 204.

Records shall be kept of each daily inspection and the weekly velocity or pressure drop measurements, and shall include any corrective actions taken by the permittee.

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

(8) The permittee shall inspect and monitor at least quarterly with a Photoionization Detector or equivalent device all positive pressure locations between the permanent enclosure of the coater and the RTO for unacceptable VOC emission levels (greater than 100 ppm) and maintain records of the results in accordance with the permittee's 1998 preventive

maintenance plan or equivalent. Records shall be maintained of each inspection and monitoring and shall include the following:

a. line speed;

b. fan speed;

c. VOC content of the coating applied at the time of monitoring;

d. the highest VOC concentration (in ppm by volume); and

e. any corrective action, if taken.

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

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified above.

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

(2) If required, the permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day coating usagelimitation of 1354 tons for all the coatings applied.

Otherwise, the permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the annual coating usage limitation of 1354 tons for all the coatings applied.

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

(3) If required, the permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the 365-day VOC emission limit of 153.0 tons for all the coatings employed.

Otherwise, the permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the 153 ton annual limit for VOC emissions (including Organic HAPs emissions.

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

(4) The permittee shall submit annual reports that specify the total VOC emissions, including total organic HAP emissions, and the total coating usagefor this emissions unit. These reports shall be submitted by January 31 of each year.

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

(5) Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR Part 63 Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

a. the methods used to determine compliance;

b. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in according with the test methods specified in 40 CFR Part 63, Subpart JJJJ;

e. an analysis demonstrating whether the affected source is a major source or an area source;

f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

g. a statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63 Subpart JJJJ.

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

(6) The permittee shall submit quarterly deviation reports that identify all exceedances of the 100 ppm, by volume, VOC concentration limitation specified in d)(8).

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

(7) The permittee shall submit quarterly summaries of the daily inspections and weekly velocity or pressure drop measurements for the permanent enclosure. The summaries shall identify the days when the permanent enclosure was not functioning properly, the cause(s) for the improper operation, and the corrective actions taken.

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

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

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

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

f) Testing Requirements

(1) USEPA Method 24 shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine VOC content for all coatings. VOC content from data sheets, resulting from the use of Method 24 may also be used. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the cleanup materials.

In accordance with USEPA's written approval of February 11, 1998, Headspace Gas Chromatographic Technique, modified Method 8260, may be used to determine the VOC content of water based coatings pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001). If an owner or operator determines that Method 24 or any other previously approved method by USEPA cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of ready to use and experimental coatings if the amount of a specific formulation of a ready to use or an experimental coating used, is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24.

The amount of experimental coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

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

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

95% overall organic HAPs reduction ~~by weight~~ (with a 100% capture efficiency and at least a 95% destruction efficiency) for all coatings

Applicable Compliance Method:

Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C).

b. Emission Limitation:

VOC emissions shall not exceed 153.0 tons per year, including total organic HAPs;

or and, if required, VOC emissions shall not exceed 153 tons per year on a rolling, 365-day basis, including total organic HAP.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of Section d)(2), d)(3), d)(2) and d)(3) of these terms and conditions.

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

a. The emission testing shall be conducted within 5 (five) years of the last test date, and every 5 years, thereafter, unless otherwise required by Ohio EPA;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation and destruction efficiency limitation for VOCs and for Organic HAPs of at least 90% and 95%, respectively, and 100% capture efficiency;

c. The following test methods shall be employed to demonstrate compliance with the capture efficiency and destruction efficiency limitation for VOC:

Method 25 of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are less than 50ppm; and

Method 204 of 40 CFR Part 51 Appendix M.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and

d. the test shall be conducted while the emissions unit is operating at average or typical operating conditions, to determine compliance with the overall destruction efficiency limit, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

e. The capture efficiency shall be determined using Methods 204 through Method 204F, as specified 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request for the use of an alternative method, including an evaluation of the applicability, neccessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)

f. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA and local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northeast District Office of the Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of the Ohio EPA.

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

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

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

g) Miscellaneous Requirements

(1) None.

2. K002, R-2 Coater

Operations, Property and/or Equipment Description:

R-2 coater - pressure sensitive coater, drying ovens & R-2 corona treater (new installation in 1996-97) with regenerative thermal oxidizer (RTO) shared with R-1, Building #7

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-9669)	Volatile organic compound (VOC) emissions shall not exceed 8.79 pounds per hour, including cleanup materials, as a daily average. VOC emissions shall not exceed 38.5 tons per year, including cleanup materials.
b.	OAC rule 3745-31-05(D)(1)(a) (synthetic minor for NNSR)	VOC emissions shall not exceed 38.5 tons per year. The permittee shall maintain a 99.6 % overall reduction of VOC by weight (100% capture and 99.6% destruction).
c.	OAC rule 3745-21-09(F)(1) and OAC rule 3745-21-09(B)(6)	The VOC overall reduction efficiency specified by this rule is less stringent than the efficiencies established pursuant to PTI 02-9669 and OAC rule 3745-31-05(D)(1)(a).
d.	OAC rule 3745-21-09(F) and OAC rule 3745-21-09(F)(2)(a)	The emission limitations specified by this rule are equivalent or less stringent than the emission limitations specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1).

e.	OAC rule 3745-21-09(F)(2)(b)	See c)(11).
f.	40 CFR Part 60, Subpart RR	The overall reduction efficiency specified by this rule for the use of the regenerative thermal oxidizer (RTO) is less stringent than the overall control efficiency established pursuant to OAC rule 3745-31-05(D)(1)(a).
g.	40 CFR Part 63, Subpart DDDDD	See b)(2)c.
h.	40 CFR Part 63, Subpart JJJJ Section 63.3320	The permittee shall maintain a 95% overall organic HAPs reduction by weight (with a 100% capture efficiency accomplished through the use of a permanent total enclosure (PTE) and at least a 95% destruction efficiency through the use of an RTO). See b)(2)d and b)(2)e. See e)(8).

(2) Additional Terms and Conditions

a. This emissions unit is a pressure sensitive, adhesive, solvent based, paper coating line including coating stations, drying ovens, unwind and windup stations, and a corona treater. It is located in Building # 7 of the Marking Films Division. The maximum capacity of the coating line, based upon the current worst case VOC-containing coating and the maximum line speed and coating coverage, is 9,633.37 tons of VOC in a year.

b. VOC emissions shall include all organic HAP/HAPs emissions.

c. The natural gas fuel fired oven burners/heaters for process heat associated with this emissions unit are small gaseous fuel fired process heaters with heat input ratings below 10 mmBtu/hr.

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

d. The permittee shall maintain a permanent total enclosure (PTE) that complies with the requirements in Reference Method 204 (40 CFR Part 51, Appendix M), to capture the VOC emissions, including total organic HAP emissions, from this emissions unit whenever this emissions unit is in operation.

e. Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR 63.3330, the source must limit HAP emissions from the affected source to:

i. no more than 5 percent of the organic HAP applied for each month (95 percent reduction); or

ii. no more than 4.0 percent of the mass of coating materials applied for each month; or

iii. no more than 20.0 percent of the mass of coating solids applied for each month; or

iv. thepermittee shall operate (if an oxidizer is used) the oxidizer such that an outlet organic HAP concentration of no greater than 20 ppmv by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

c) Operational Restrictions

(1) Coatings that contain solvent shall not be employed in this emissions unit without the beneficial use of the regenerative thermal oxidizer (RTO).

(2) The average combustion temperature within the RTO, for any 3-hour block of time when this emissions unit is in operation and employing coatings, shall not be below the average temperature during the most recent emission test that demonstrated this emissions unit was in compliance. The minimum allowable operating temperature based on a 3-hour average for the RTO serving this emissions unit has been established at 1497 degrees Fahrenheit, based on an emissions testing report dated November 2, 2011.

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

(3) This emissions unit shall be totally enclosed such that all the VOC emissions, including total organic HAP emissions, are captured. Compliance with the following criteria, identified by USEPA Method 204 of 40 CFR Part 51, Apendix M shall be met by the permittee:

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

b. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

c. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm) as described in Method 204. The direction of air flow through all NDO's shall be into the enclosure.

d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

e. All VOC emissions, including total organic HAP emissions, resulting from coatings employed in this emissions unit must be captured and vented to the RTO.

(4) The RTO control system shall be designed and operated according to good engineering practices and the manufacturer's specifications, including any lower explosive limit (LEL) monitors in any RTO bypass ducts. (LEL monitors are monitors that are set at a concentration point and when the concentration gets to the set level, shutdown or an alarm may occur in order to avoid flammability and/or explosion.)

(5) The LEL monitors that are used to signal inappropriate bypass use for nonemergency solvent coatings, shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

(6) The coating line shall be vented to the RTO during all coating operations.

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

(7) The permittee shall use the bypass of the RTO for emergency purposes, only. Solvent containing coatings, employed in this emissions unit, shall not be vented through the bypass of the RTO, except during emergency situations.

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

(8) The permittee shall limit coating usage so that the amount of VOC applied from the coatings is no more than 9633.37 tons per year.

(9) When the emissions unit is in operation, the PTE shall be maintained under negative pressure at a minimum differential pressure, in inches of water as a 3-hour average, that is equal to or greater than the differential pressure that was established at the time of the last emissions test that demonstrated compliance with the criteria for the PTE. The corresponding differential pressure shall be determined for the PTE when compliance with the 200 fpm facial velocity is demonstrated.

(10) The concentrations of VOC emissions, including total organic HAP emissions, measured in accordance with the leak monitoring program of all positive pressure portions of the permanent enclosure shall not exceed 100 ppm, by volume.

(11) **Work practice standards for cleaning materials**

Unless emissions to the atmosphere are controlled by an approved emission control system with an overall control efficiency of at least ninety per cent, any person using an organic solvent for cleanup shall:

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

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

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

c. minimize spills of VOC-containing cleaning materials;

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

e. minimize VOC emissions, including total organic HAP emissions, from cleaning storage, mixing, and conveying equipment.

The permittee shall post copies of these requirements around dip tanks and storage tanks, conduct training about these requirements, along with managerial audits and checks of variable frequencies and/or other means of continuing compliance.

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

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

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

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was less than the average

temperature during the most recent emission test that demonstrated that the emission unit was in compliance;

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

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

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

(2) The permittee shall inspect and monitor at least quarterly with a Photoionization Detector or equivalent device all positive pressure locations between the permanent enclosure of the coater and the RTO for unacceptable VOC emission levels (greater than 100 ppm) and maintain records of the results in accordance with the permittee's 1998 preventive maintenance plan or equivalent. Records shall be maintained of each inspection and monitoring and shall include the following:

a. line speed;

b. fan speed;

c. VOC content of the coating applied at the time of monitoring;

d. the highest VOC concentration (in ppm by volume); and

e. any corrective action taken.

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

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

a. the name and identification number of each coating, as applied;

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

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

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

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

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

g. the total uncontrolled VOC emissions, including total organic HAP emissions, from all coatings applied and from all cleanup materials employed, in tons (equals VOC applied);

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

i. the total VOC emission rate, i.e., controlled VOC emissions, including total organic HAP emissions, from all coatings plus uncontrolled emissions from all cleanup materials, in tons.

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

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

a. the total VOC emissions, including total organic HAP emissions,, in pounds, i.e., d)(3)h;

b. the total operating hours of the coating line; and

c. the average hourly VOC emission rate, in pounds/hr (a/b).

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

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

a. the monthly sum of the total daily VOC emissions, including total organic HAP emissions, from this emissions unit, i.e., the monthly sum of the daily values from d)(3)i; and

b. the cumulative, year-to-date, VOC emission s for the calendar year, in tons.

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

(6) The permittee shall operate and maintain, a continuous pressure drop monitor and recorder which measures and records the pressure drop across the total enclosure when the permittee is employing coatings in this emissions unit. Units shall be in inches of water. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The pressure drop monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential, in inches of water or velocity as a 3-hour average, specified in section c)(9); and

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

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

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

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

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

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

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the RTO, did not comply with the temperature limitation specified above.

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

(2) The permittee shall submit annual reports that specify the total VOC emissions, including total organic HAP emissions, for this emissions unit. These reports shall be submitted by January 31 of each year.

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

(3) The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly VOC emissions, including total organic HAP emissions, exceeded 8.79 pounds per hour, and the actual average hourly VOC emissions, including total organic HAP emissions, for each such day.

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

(4) Beginning with the first calendar quarter following the installation of the pressure drop monitoring equipment for the PTE, the permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time, when the emissions unit was in solvent based operation, during which the PTE was not maintained at the minimum pressure differential required in c)(9).

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

(5) The permittee shall submit quarterly summaries of the daily inspections and weekly velocity or pressure drop measurements for the PTE. The summaries shall identify the days when the PTE was not functioning properly, the cause(s) for the improper operation, and corrective actions taken. The quarterly summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

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

(6) Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR Part 63 Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

a. the methods used to determine compliance;

b. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in according with the test methods specified in 40 CFR Part 63, Subpart JJJJ;

e. an analysis demonstrating whether the affected source is a major source or an area source;

f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

g. a statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63, Subpart JJJJ.

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

(7) The permittee shall submit quarterly deviation reports that identify all exceedances of the 100 ppm, by volume, VOC concentration limitation specified in c)(10).

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

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

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

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

f) Testing Requirements

(1) USEPA Method 24 shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine VOC content for all coatings. VOC content from data sheets, resulting from the use of Method 24 may also be used. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the cleanup materials.

In accordance with USEPA's written approval of February 11, 1998, Headspace Gas Chromatographic Technique, modified Method 8260, may be used to determine the VOC content of water based coatings pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001). If an owner or operator determines that Method 24 or any other previously approved method by USEPA cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of ready to use and experimental coatings if the amount of a specific formulation of a ready to use or an experimental coating used, is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24.

The amount of experimental coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

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

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

99.6% overall VOC reduction, including organic HAPs, by weight (100% capture and 99.6% destruction)

Applicable Compliance Method:

Performance testing shall be conducted within five (5) years of the last emissions testing that demonstrated compliance and every 5 years, thereafter, unless otherwise required by Ohio EPA using the following methods: 40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M, Method 204.

Compliance shall be demonstrated by emissions testing using the procedures specified in OAC rule 3745-21-10(C).

b. Emission Limitation:

8.79 lbs VOC/hr on a daily average basis

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(3) and d)(4).

c. Emission Limitation:

38.5 tons per calendar year including cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(3), d)(4) and d)(5) and shall be the sum of the daily values for d)(3)i.

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

a. The emission testing shall be conducted within five (5) years of the last emissions testing that demonstrated compliance, and every 5 years, thereafter, unless otherwise required by Ohio EPA;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation and destruction efficiency limitation for VOCs and for Organic HAPs of at least 99.6% and 95%, respectively, and 100% capture efficiency;

c. The following test methods shall be employed to demonstrate compliance with the destruction efficiency limitation and capture efficiency for VOC and HAPs:

   i. if the VOC concentrations as carbon in the outlet are greater than 50 ppm use 40 CFR Part 60, Appendix A, Method 25;

   ii. if the VOC concentrations as carbon in the outlet are less than 50ppm use 40 CFR Part 60, Appendix A, Method 25A; and

   iii. for capture efficiency, 40 CFR Part 51, Appendix M, Method 204.

   Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA; and

d. The test shall be conducted while the emissions unit is operating at average or typical operating conditions, to determine compliance with the overall destruction efficiency limit, and maximum operating conditions, to determine the mass rate of emissions, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

e. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

f. The capture efficiency shall be determined using Methods 204 through Method 204F, as specified 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request for the use of an alternative method, including an evaluation of the applicability, neccessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA and local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating

parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northeast District Office of the Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of the Ohio EPA.

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

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

g) Miscellaneous Requirements

(1) None.

3. P052, Compounding Mixers & Weigh Stations

Operations, Property and/or Equipment Description:

215-1 Compounding Mixer, 215-1 Weigh Station, 215-2 Compounding Mixer, & 215-2 Weigh tation

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/01 (PTI 02-7430)	Organic compound (OC) emissions shall not exceed 1.25 pounds per hour, 30.00 pounds per day and 5.48 tons per year. See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(A)(3) as effective 12/01/06	See b)(2)c.

(2) Additional Terms and Conditions

a. Monitoring and/or record keeping requirements for OC are not required by this permit. Based on the maximum capacities of all the equipment and an estimate of the total OC emissions using emission factors from AP-42, Section 4.6 on solvent degreasing, the actual OC emissions could not exceed the allowable emission rates from this rule.

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

December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions shall not exceed 1.25 pounds per hour.

Applicable Compliance Method:

The weigh stations are treated as cold cleaners with agitation. The emission factor, derived using AP-42, 5th edition, 1981, Section 4.6 on Solvent Degreasing, and adding a 50% increment to allow for agitation, is 0.12 lb/hr-ft2.

The mixers for mixing polyester solution, ester pigment and glycol cellulose are treated as polymer blending operations associated with the production of neoprene. The emission factor is obtained from the AirChief CDROM database, Version 2.0 Beta, April 1992, and is based on a review of air emissions generated by polychloroprene manufacturing prepared for the Industrial Environmental Research Laboratory (IERL) of the USEPA by Monsanto Research Corporation. The associated reference is titled "Source Assessment: Polychloroprene, State of the Art," December, 1977. The emission factor is 0.42 lb VOC (OC) emitted per ton blended.

A maximum of 19.2 batches can be processed per day.

The maximum weight per batch is 311.3 pounds.

The daily OC emissions are calculated as follows:

(0.12 lb/hr-ft2) x (1 hr/batch) x (Number of batches for open-top drums) x (3.69 ft2) + (0.42 lb/ton) x (Number of batches for open-top drums) x (311.3 lbs/batch) =

((0.12 lb/hr-ft2) x (1 hr/batch) x (19.2 batches/day) x (3.69 ft2)) + ((0.42 lb/ton) x (19.2 batches/day) x (311.3 lbs/batch) x (1ton/2000lbs)) = 9.76 lbs/day

9.76 lbs/day x (1 day/ 24 hours)= 0.41 lb per hour

where open top drums with a diameter of 26 inches, and a surface area of 3.62 ft2 and maximum weight capacity of 311.3 pounds per batch are used.

Because these OC emissions were calculated based on maximum capacities and design of all equipment, allowables cannot be exceeded as described in b)(2)a.

b. Emission Limitation:

OC emissions shall not exceed 30.00 pounds per day.

Applicable Compliance Method:

The daily emission limitation was developed by multiplying the hourly allowable OC emission limitation (1.25 lbs/hr) by 24 hours of operation per day. Therefore, if compliance is shown with the hourly allowable emission limitation, compliance is demonstrated with the daily emission limitation.

c. Emission Limitation:

OC emissions shall not exceed 5.48 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable OC emission limitation (1.25 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.