



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17438

Fac ID: 0322020019

DATE: 5/29/2008

Okamoto Sandusky Manufacturing, LLC
Tom Chiantello
3130 W Monroe St
Sandusky, OH 44870

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

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

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

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

Sincerely,

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 5/29/2008
Effective Date: 5/29/2008**

FINAL PERMIT TO INSTALL 03-17438

Application Number: 03-17438
Facility ID: 0322020019
Permit Fee: **\$1700**
Name of Facility: Okamoto Sandusky Manufacturing, LLC
Person to Contact: Tom Chiantello
Address: 3130 W Monroe St
Sandusky, OH 44870

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3130 W Monroe St
Sandusky, Ohio**

Description of proposed emissions unit(s):
Installation of Calendering Line, Expansion Line, Kawakami Laminator, Embosser No. 5, Printer No. 2, 3 and 4.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Okamoto Sandusky Manufacturing, LLC

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Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

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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. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then 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 are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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4. 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.

5. 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.

6. 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 re-issuance, or modification
- 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, revoked, or revoked and reissued, for cause. 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 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.

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7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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:
 - i. 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.
 - ii. 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 ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

12. Air Pollution Nuisance

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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.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. 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

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of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

6. Public Disclosure

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

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	179.84
PE	29.40
NO _x	4.03
CO	3.38
Xylene	13.59
MIBK	8.17
Toluene	3.26

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. The following emission units contained in this permit are subject to 40 CFR Part 63, Subparts A and JJJJ: P030, P031, K002, K003, and K004. 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://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northwest District Office.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K002) - Printer No. 2 that consists of an unwind station, five print heads, five oven sections, cooling fans, trim area and wind-up. The emissions from this emissions unit are exhausted to a regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-09(H)	See A.I.2.a
40 CFR Part 60 Subpart FFF	See A.I.2.a
OAC rule 3745-31-05(A)(3)	See A.I.2.b 8.38 pounds of volatile organic compounds (VOC) per hour and 36.71 tons of VOC per year for coating and cleanup materials <u>Combustion of natural gas from regenerative thermal oxidizer:</u> 2.37 tons of nitrogen oxides (NO _x) per year 1.99 tons of carbon monoxide (CO) per year 0.18 tons of particulate emissions (PE) per year 0.13 tons of VOC per year
40 CFR Part 63, Subpart JJJJ 40 CFR 63.3320(b)(1)	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or
40 CFR 63.3320(b)(2)	Organic HAP emissions shall be limited to no more than 4% of coatings applied for the month; or
40 CFR 63.3320(b)(3)	Organic HAP emissions shall be limited to no more than 20% of solids applied for the month; or
40 CFR 63.3320(b)(4)	Operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.
40 CFR Part 63, Subpart A	See A.I.2.c

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40 CFR Part 64	See A.I.2.d
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2. Additional Terms and Conditions

- 2.a** The requirements of this rule are less stringent than the requirements in 40 CFR Part 63 Subpart JJJJ for Paper and other Web Coating.
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart FFF and 40 CFR Part 63 Subparts A and JJJJ.
- 2.c** Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.
- 2.d** Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit.

II. Operational Restrictions

- 1.** All of the VOC emissions from emissions units K002, K003, K004, P029, P030 and P031 shall be vented to the regenerative thermal oxidizer (RTO) when one or more of these emissions units are in operation.
- 2.** See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3321(a), Table 1 to Subpart JJJJ of Part 63—Operating Limits if Using Add-On Control Devices and Capture System, and 40 CFR 63.3360(e)(3) for establishing the operating limits during the performance test.
- 3.** The coating line shall be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a.** any "Natural Draft Opening" (NDO)* shall be at least 4 equivalent diameters from each VOC emission point;
 - b.** the total area of all NDOs shall not exceed 5% 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 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
 - d.** all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during

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routine operation; and

- e. all VOC emissions must be captured and vented to the VOC control device.

By satisfying the above criteria for a permanent total enclosure, the VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

- 4. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as an hourly average (equivalent to at least 200 feet/minute airflow into the permanent total enclosure through all natural draft openings), whenever the emissions unit is in operation and all the VOCs are being vented to the RTO.

III. Monitoring and/or Recordkeeping Requirements

- 1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, in any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.
- 2. 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 and prior approval by the Northwest District Office.

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

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

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- b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

- 3. Whenever the monitored average combustion temperature within the RTO deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- 4. The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted temperature range/limit based

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upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

5. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;
 - c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;
 - d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit(s) was/were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.
3. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).
4. The permittee shall submit quarterly summaries that include a log of the downtime for

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the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.

5. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section A.II.4. of the terms and conditions of this permit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

All quarterly reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. 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 6 months after commencing operation of this emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC and HAP.
 - c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10, 40 CFR Part 60

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Subpart JJJJ or an alternative test protocol approved by the Ohio EPA. 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.

- e. The testing shall be conducted while the emissions unit is operating at or near maximum VOC loading conditions, unless otherwise specified or approved by the Northwest District Office. The operating scenario may also require the permittee to test this emissions unit at normal VOC loading conditions to demonstrate worst-case loading conditions.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Northwest District Office 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.

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 Northwest District Office 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 Northwest District Office.

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

- a. Emission Limitation:
8.38 pounds of volatile organic compounds (VOC) per hour for coating and cleanup materials and 36.71 tons of VOC per year for coating and cleanup materials

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1. The annual limitation was developed by multiplying the potential lbs/hr emission rate by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly

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emission rate, compliance with the annual limitation will be assumed.

b. Emission Limitation:

Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or

Organic HAP emissions shall be limited to no more than 4% of coatings applied for the month; or

Organic HAP emissions shall be limited to no more than 20% of solids applied for the month; or

Operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1. and as described in sections 63.3370(e) and 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

c. Emission Limitation:

2.37 tons of nitrogen oxides (NO_x) per year

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 100 pounds of NO_x per million standard cubic foot (scf) with 5.4 million Btu per hour and conversion factors 1 scf/1000 Btu, 1 ton/2000 pounds and 8760 hrs/yr.

d. Emission Limitation:

1.99 tons of carbon monoxide (CO) per year

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 84 pounds of CO per million standard cubic foot (scf) with 5.4 million Btu per hour and conversion factors 1 scf/1000 Btu, 1 ton/2000 pounds and 8760 hrs/yr.

e. Emission Limitation:

0.18 tons of PE per year

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor

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(Section 1.4, 7/1998) of 7.6 pounds of PE per million standard cubic foot (scf) with 5.4 million Btu per hour and conversion factors 1 scf/1000 Btu, 1 ton/2000 pounds and 8760 hrs/yr.

- f. Emission Limitation:
0.13 tons of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 5.5 pounds of VOC per million standard cubic foot (scf) with 5.4 million Btu per hour and conversion factors 1 scf/1000 Btu, 1 ton/2000 pounds and 8760 hrs/yr.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K002) - Printer No. 2 that consists of an unwind station, five print heads, five oven sections, cooling fans, trim area and wind-up. The emissions from this emissions unit are exhausted to a regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K003) - Printer No. 3 that consists of an unwind station, five print heads, five oven sections, cooling fans, trim area and wind-up. The emissions from this emissions unit are exhausted to a regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-09(H)	See A.I.2.a
40 CFR Part 60 Subpart FFF	See A.I.2.a
OAC rule 3745-31-05(A)(3)	See A.I.2.b 8.38 pounds of volatile organic compounds (VOC) per hour and 36.71 tons of VOC per year for coating and cleanup materials
40 CFR Part 63, Subpart JJJJ 40 CFR 63.3320(b)(1)	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or
40 CFR 63.3320(b)(2)	Organic HAP emissions shall be limited to no more than 4% of coatings applied for the month; or
40 CFR 63.3320(b)(3)	Organic HAP emissions shall be limited to no more than 20% of solids applied for the month; or
40 CFR 63.3320(b)(4)	Operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.
40 CFR Part 63, Subpart A	See A.I.2.c
40 CFR Part 64	See A.I.2.d

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2. Additional Terms and Conditions

- 2.a** The requirements of this rule are less stringent than the requirements in 40 CFR Part 63 Subpart JJJJ for Paper and other Web Coating.
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart FFF and 40 CFR Part 63 Subparts A and JJJJ.
- 2.c** Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.
- 2.d** Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit.

II. Operational Restrictions

- 1.** All of the VOC emissions from emissions units K002, K003, K004, P029, P030 and P031 shall be vented to the regenerative thermal oxidizer (RTO) when one or more of these emissions units are in operation.
- 2.** See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3321(a), Table 1 to Subpart JJJJ of Part 63—Operating Limits if Using Add-On Control Devices and Capture System, and 40 CFR 63.3360(e)(3) for establishing the operating limits during the performance test.
- 3.** The coating line shall be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a.** any "Natural Draft Opening" (NDO)* shall be at least 4 equivalent diameters from each VOC emission point;
 - b.** the total area of all NDOs shall not exceed 5% 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 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
 - d.** all access doors and windows whose areas are not included in paragraph (b)

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and are not included in the calculation in paragraph (c) shall be closed during routine operation; and

- e. all VOC emissions must be captured and vented to the VOC control device.

By satisfying the above criteria for a permanent total enclosure, the VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

- 4. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as an hourly average (equivalent to at least 200 feet/minute airflow into the permanent total enclosure through all natural draft openings), whenever the emissions unit is in operation and all the VOCs are being vented to the RTO.

III. Monitoring and/or Recordkeeping Requirements

- 1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, in any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.
- 2. 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 and prior approval by the Northwest District Office.

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

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control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
- b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

3. Whenever the monitored average combustion temperature within the RTO deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

4. The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office.

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The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

5. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;
 - c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;
 - d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit(s) was/were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.
3. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

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4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.
5. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section A.II.4 of the terms and conditions of this permit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

All quarterly reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. 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 6 months after commencing operation of this emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC and HAP.
 - c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the

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test methods and procedures specified in OAC rule 3745-21-10, 40 CFR Part 60 Subpart JJJJ or an alternative test protocol approved by the Ohio EPA. 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.

- e. The testing shall be conducted while the emissions unit is operating at or near maximum VOC loading conditions, unless otherwise specified or approved by the Northwest District Office. The operating scenario may also require the permittee to test this emissions unit at normal VOC loading conditions to demonstrate worst-case loading conditions.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Northwest District Office 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.

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 Northwest District Office 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 Northwest District Office.

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

- a. Emission Limitation:
8.38 pounds of volatile organic compounds (VOC) per hour and 36.71 tons of VOC per year for coating and cleanup materials

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1. The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission

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rate, compliance with the annual limitation will be assumed.

b. Emission Limitation:

Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or

Organic HAP emissions shall be limited to no more than 4% of coatings applied for the month; or

Organic HAP emissions shall be limited to no more than 20% of solids applied for the month; or

Operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1. and as described in sections 63.3370(e) and 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (K003) - Printer No. 3 that consists of an unwind station, five print heads, five oven sections, cooling fans, trim area and wind-up. The emissions from this emissions unit are exhausted to a regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K004) - Printer No. 4 that consists of an unwind station, five print heads, five oven sections, cooling fans, trim area and wind-up. The emissions from this emissions unit are exhausted to a regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-09(H)	See A.I.2.a
40 CFR Part 60 Subpart FFF	See A.I.2.a
OAC rule 3745-31-05(A)(3)	See A.I.2.b 8.38 pounds of volatile organic compounds (VOC) per hour and 36.71 tons of VOC per year for coating and cleanup materials
40 CFR Part 63, Subpart JJJJ 40 CFR 63.3320(b)(1)	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or
40 CFR 63.3320(b)(2)	Organic HAP emissions shall be limited to no more than 4% of coatings applied for the month; or
40 CFR 63.3320(b)(3)	Organic HAP emissions shall be limited to no more than 20% of solids applied for the month; or
40 CFR 63.3320(b)(4)	Operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.
40 CFR Part 63, Subpart A	See A.I.2.c
40 CFR Part 64	See A.I.2.d

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2. Additional Terms and Conditions

- 2.a** The requirements of this rule are less stringent than the requirements in 40 CFR Part 63 Subpart JJJJ for Paper and other Web Coating.
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart FFF and 40 CFR Part 63 Subparts A and JJJJ.
- 2.c** Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.
- 2.d** Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit.

II. Operational Restrictions

- 1.** All of the VOC emissions from emissions units K002, K003, K004, P029, P030 and P031 shall be vented to the regenerative thermal oxidizer (RTO) when one or more of these emissions units are in operation.
- 2.** See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3321(a), Table 1 to Subpart JJJJ of Part 63—Operating Limits if Using Add-On Control Devices and Capture System, and 40 CFR 63.3360(e)(3) for establishing the operating limits during the performance test.
- 3.** The coating line shall be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a.** any "Natural Draft Opening" (NDO)* shall be at least 4 equivalent diameters from each VOC emission point;
 - b.** the total area of all NDOs shall not exceed 5% 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 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
 - d.** all access doors and windows whose areas are not included in paragraph (b)

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and are not included in the calculation in paragraph (c) shall be closed during routine operation; and

- e. all VOC emissions must be captured and vented to the VOC control device.

By satisfying the above criteria for a permanent total enclosure, the VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

- 4. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as an hourly average (equivalent to at least 200 feet/minute airflow into the permanent total enclosure through all natural draft openings), whenever the emissions unit is in operation and all the VOCs are being vented to the RTO.

III. Monitoring and/or Recordkeeping Requirements

- 1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, in any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.
- 2. 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 and prior approval by the Northwest District Office.

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

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

- b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

- 3. Whenever the monitored average combustion temperature within the RTO deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- 4. The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office.

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The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

5. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;
 - c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;
 - d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit(s) was/were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.
3. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

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4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.
5. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section A.II.4 of the terms and conditions of this permit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

All quarterly reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. 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 6 months after commencing operation of this emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC and HAP.
 - c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the

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test methods and procedures specified in OAC rule 3745-21-10, 40 CFR Part 60 Subpart JJJJ or an alternative test protocol approved by the Ohio EPA. 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.

- e. The testing shall be conducted while the emissions unit is operating at or near maximum VOC loading conditions, unless otherwise specified or approved by the Northwest District Office. The operating scenario may also require the permittee to test this emissions unit at normal VOC loading conditions to demonstrate worst-case loading conditions.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Northwest District Office 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.

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 Northwest District Office 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 Northwest District Office.

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

- a. Emission Limitation:
8.38 pounds of volatile organic compounds (VOC) per hour and 36.71 tons of VOC per year for coating and cleanup materials

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1. The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission

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rate, compliance with the annual limitation will be assumed.

b. Emission Limitation:

Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources; or

Organic HAP emissions shall be limited to no more than 4% of coatings applied for the month; or

Organic HAP emissions shall be limited to no more than 20% of solids applied for the month; or

Operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1. and as described in sections 63.3370(e) and 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (K004) - Printer No. 4 that consists of an unwind station, five print heads, five oven sections, cooling fans, trim area and wind-up. The emissions from this emissions unit are exhausted to a regenerative thermal oxidizer.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P028) - Calendering Line that includes 2 new blenders, 2 new banbury mixers, (3) 2-roll mills, an extruder/strainer and a calender. The two bag break stations and two blenders are controlled by the Griffin baghouse whereas the two new banbury mixers will be controlled by a two-stage fabric filter system with mist eliminator.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-07(A)	See A.I.2.a
OAC rule 3745-31-05(A)(3)	See A.I.2.b 1.08 pounds of particulate emissions (PE) per hour and 4.73 tons of PE per year from dry material handling and blending operations Visible PE shall not exceed 0% opacity, as a 6-minute average from dry material handling and blending operations 3.92 pounds of PE per hour and 17.17 tons of PE per year from heated rolling and calendering operations 3.92 pounds of volatile organic compounds (VOC) per hour and 17.17 tons of VOC per year from heated rolling and calendering operations Visible PE shall not exceed 10% opacity, as a 6-minute average from heated rolling and calendering operations
40 CFR Part 64	See A.I.2.c

2. Additional Terms and Conditions

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- 2.a** The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b** Permit to Install 03-17438 for this air contaminant source takes into account the following control equipment as proposed by the permittee for the purpose of complying with Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - I. use of a Griffin baghouse to achieve a 0.009 grains per standard cubic foot outlet concentration on the dry material handling and blending operations; and
 - ii. use of two-stage fabric filter with mist eliminator to control PE and VOC from heated rolling and calendaring operations.
- 2.c** The Griffin baghouse is considered an inherent process equipment and is therefore exempt from Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64.
- 2.d** All PE is considered as particulate matter 10 microns in diameter or less (PM10).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. 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 6 months after commencing operation of this emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the concentration and hourly particulate emission rate of PE from dry material handling and blending operations vented from the Griffin baghouse.
 - c. The following test method(s) shall be employed to demonstrate compliance with the emission and concentration limitations: Methods 1-5 of 40 CFR Part 60. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 - d. The testing shall be conducted while the emissions unit is operating at or near maximum loading conditions, unless otherwise specified or approved by the Northwest District Office.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Northwest District Office 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.

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 Northwest District Office 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 Northwest District Office.

Emissions Unit ID: P028

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

- a. Emission Limitation:
0.009 grains per dry standard cubic foot

Applicable Compliance Method:
Compliance with the grain loading concentration shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

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- b. Emission Limitation:
1.08 pounds of particulate emissions (PE) per hour and 4.73 tons of PE per year from dry material handling and blending operations

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1. The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

- c. Emission Limitation:
3.92 pounds of PE per hour and 17.17 tons of PE per year from heated rolling and calendering operations

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the facility emission factor of 0.005 pounds of PE per pound of plasticizer with 783.89 pounds of plasticizer processed per hour. The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

- d. Emission Limitation:
3.92 pounds of VOC per hour and 17.17 tons of VOC per year from heated rolling and calendering operations

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the facility emission factor of 0.005 pounds of VOC per pound of plasticizer with 783.89 pounds of plasticizer processed per hour. The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P028) - Calendering Line that includes 2 new blenders, 2 new banbury mixers, (3) 2-roll mills, an extruder/strainer and a calender. The two bag break stations and two blenders are controlled by the Griffin baghouse whereas the two new banbury mixers will be controlled by a two-stage fabric filter system with mist eliminator.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P029) - Expansion Line consists of a series of three natural gas direct-fired ovens, an infra-red heater, an embossing station, a cooling station and a wind-up. The emissions from this unit will be vented to a CVM Fume Eliminator.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-09(H)	See A.1.2.a
OAC rule 3745-31-05(A)(3)	<p><u>Plastic film heating:</u> 0.97 pounds of particulate emissions (PE) per hour and 4.26 tons of PE per year</p> <p>0.97 pounds of volatile organic compounds (VOC) per hour and 4.26 tons of VOC per year</p> <p><u>Combustion of natural gas:</u> 1.66 tons of nitrogen oxides (NO_x) per year 1.39 tons of carbon monoxide (CO) per year 0.09 tons of VOC per year 0.13 tons of PE per year</p>

2. Additional Terms and Conditions

- 2.a Permit to Install 03-17438 for this air contaminant source takes into account the following control equipment as proposed by the permittee for the purpose of complying with requirements under OAC rule 3745-21-09(H)(2):

use of a CVM Fume Eliminator that is designed to have a 100% capture efficiency and a 95% control efficiency of PE and VOC emissions from this emissions unit.

Emissions Unit ID: P029

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2.b All PE is considered as particulate matter 10 microns in diameter or less (PM10).

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II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stacks serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. 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 6 months after commencing operation of this emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the hourly emission rate of PE and VOC and the capture and control efficiency of the control equipment.
 - c. The following test method(s) shall be employed to demonstrate compliance with the emission limitations: Methods 1-5, 18 and 25 or 25A of 40 CFR Part 60. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

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- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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 testing shall be conducted while the emissions unit is operating at or near maximum loading conditions, unless otherwise specified or approved by the Northwest District Office.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Northwest District Office 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.

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 Northwest District Office 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 Northwest District Office.

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

- a. Emission Limitation:
0.97 pounds of PE per hour and 4.26 tons of PE per year from plastic film heating operations

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

- b. Emission Limitation:
0.97 pounds of VOC per hour and 4.26 tons of VOC per year from plastic film heating operations

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

- c. Emission Limitation:
1.66 tons of nitrogen oxides (NO_x) per year

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 100 pounds of NO_x per million standard cubic foot (scf) with 3.78 million Btu per hour and conversion factors 1 scf/1000 Btu, 1 ton/2000 pounds and 8760 hrs/yr.

- d. Emission Limitation:
1.39 tons of carbon monoxide (CO) per year

Applicable Compliance Method:

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Compliance shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 84 pounds of CO per million standard cubic foot (scf) with 3.78 million Btu per hour and conversion factors 1 scf/1000 Btu, 1 ton/2000 pounds and 8760 hrs/yr.

- e. Emission Limitation:
0.09 tons of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 5.5 pounds of VOC per million standard cubic foot (scf) with 3.78 million Btu per hour and conversion factors 1 scf/1000 Btu, 1 ton/2000 pounds and 8760 hrs/yr.

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- f. Emission Limitation:
0.13 tons of PE per year

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor (Section 1.4, 7/1998) of 7.6 pounds of PE per million standard cubic foot (scf) with 3.78 million Btu per hour and conversion factors 1 scf/1000 Btu, 1 ton/2000 pounds and 8760 hrs/yr.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P029) - Expansion Line consists of a series of three natural gas direct-fired ovens, an infra-red heater, an embossing station, a cooling station and a wind-up. The emissions from this unit will be vented to a CVM Fume Eliminator.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P030) - Kawakami Laminator that consists of an oven, an IR heater, two unwind stations, two solvent stations, two cooling stations and a wind-up. The emissions from this emissions unit are exhausted to the RTO.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-09(H)	See A.I.2.a
40 CFR Part 60 Subpart FFF	See A.I.2.a
OAC rule 3745-31-05(A)(3)	See A.I.2.b 7.53 pounds of volatile organic compounds (VOC) per hour and 33.00 tons of VOC per year from adhesive application operations 3.10 pounds of xylene per hour and 13.59 tons of xylene per year from adhesive application operations 1.33 pounds of MIBK per hour and 5.82 tons of MIBK per year from adhesive application operations 0.37 pounds of VOC per hour and 1.63 tons of VOC per year from cleanup materials 0.37 pounds of toluene per hour and 1.63 tons of toluene per year from cleanup materials

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40 CFR Part 63, Subpart JJJJ 40 CFR 63.3320(b)(1)	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 2 percent of the organic HAP applied for each month (98 percent reduction) for each month at new affected sources; or
63.3320(b)(2)	Organic HAP emissions are limited to no more than 1.6% of coating applied for each month; or
63.3320(b)(3)	Organic HAP emissions are limited to no more than 8% of solids applied for each month.
40 CFR Part 63, Subpart A	See A.I.2.c
40 CFR Part 64	See A.I.2.d

2. Additional Terms and Conditions

- 2.a** The requirements of this rule are less stringent than the requirements in 40 CFR Part 63 Subpart JJJJ for Paper and other Web Coating.
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart FFF and 40 CFR Part 63 Subparts A and JJJJ.
- 2.c** Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.
- 2.d** Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit.

II. Operational Restrictions

- 1.** All of the VOC emissions from emissions units K002, K003, K004, P029, P030 and P031 shall be vented to the regenerative thermal oxidizer (RTO) when one or more of these emissions units are in operation.
- 2.** See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3321(a), Table 1 to Subpart JJJJ of Part 63—Operating Limits if Using Add-On Control Devices and Capture System, and 40 CFR 63.3360(e)(3) for establishing the operating limits during the performance test.

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3. The coating line shall be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO)* shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5% 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 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and vented to the VOC control device.

By satisfying the above criteria for a permanent total enclosure, the VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

4. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as an hourly average (equivalent to at least 200 feet/minute airflow into the permanent total enclosure through all natural draft openings), whenever the emissions unit is in operation and all the VOCs are being vented to the RTO.

III. Monitoring and/or Recordkeeping Requirements

1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, in any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

2. 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 and prior approval by the Northwest District Office.

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

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
- b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

3. Whenever the monitored average combustion temperature within the RTO deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

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- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- l. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

4. The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
5. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;
 - c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;
 - d. an identification of each incident of deviation described in "b" where prompt

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- corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit(s) was/were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.
3. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).
4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.
5. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section A.II.4 of the terms and conditions of this permit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

All quarterly reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. 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 6 months after commencing operation of this emissions unit.

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- b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC and HAP as well as mass emission limitations of each.
- c. The following test method(s) shall be employed to demonstrate compliance with the emission limitations: Methods 1-4, 18 and 25 or 25A of 40 CFR Part 60. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10, 40 CFR Part 60 Subpart JJJJ or an alternative test protocol approved by the Ohio EPA. 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 testing shall be conducted while the emissions unit is operating at or near maximum VOC loading conditions, unless otherwise specified or approved by the Northwest District Office. The operating scenario may also require the permittee to test this emissions unit at normal VOC loading conditions to demonstrate worst-case loading conditions.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Northwest District Office 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

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control equipment.

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 Northwest District Office 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 Northwest District Office.

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

- a. Emission Limitation:

7.53 pounds of volatile organic compounds (VOC) per hour and 33.00 tons of VOC per year from adhesive application operations

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

- b. Emission Limitation:

3.10 pounds of xylene per hour and 13.59 tons of xylene per year from adhesive application operations

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Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

c. Emission Limitation:

1.33 pounds of MIBK per hour and 5.82 tons of MIBK per year from adhesive application operations

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

d. Emission Limitation:

0.37 pounds of VOC per hour and 1.63 tons of VOC per year from cleanup materials

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

e. Emission Limitation:

0.37 pounds of toluene per hour and 1.63 tons of toluene per year from cleanup materials

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

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The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

f. Emission Limitation:

Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 2 percent of the organic HAP applied for each month (98 percent reduction) for each month at new affected sources; or

Organic HAP emissions are limited to no more than 1.6% of coating applied for each month; or

Organic HAP emissions are limited to no more than 8% of solids applied for each month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1. and as described in sections 63.3370(e) and 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P030) - Kawakami Laminator that consists of an oven, an IR heater, two unwind stations, two solvent stations, two cooling stations and a wind-up. The emissions from this emissions unit are exhausted to the RTO.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P031) - Embosser No. 5 consists of three unwind stations, a solvent adhesive station, a lamination station, infra-red heater, embossing station, cooling station and wind-up. The emissions from this emissions unit are exhausted to the RTO.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-21-09(H)	See A.I.2.a
40 CFR Part 60 Subpart FFF	See A.I.2.a
OAC rule 3745-31-05(A)(3)	<p>See A.I.2.b</p> <p>2.02 pounds of volatile organic compounds (VOC) per hour and 8.87 tons of VOC per year from adhesive application operations</p> <p>0.54 pounds of MIBK per hour and 2.35 tons of MIBK per year from adhesive application operations</p> <p>0.37 pounds of VOC per hour and 1.63 tons of VOC per year cleanup materials</p> <p>0.37 pounds of toluene per hour and 1.63 tons of toluene per year cleanup materials</p> <p>0.67 pounds of VOC per hour and 2.93 tons of VOC per year from embossing with heat operations</p> <p>0.67 pounds of particulate emissions (PE) per hour and 2.93 tons of PE per year from embossing with heat operations</p>

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40 CFR Part 63, Subpart JJJJ 40 CFR 63.3320(b)(1)	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 2 percent of the organic HAP applied for each month (98 percent reduction) for each month at new affected sources; or
63.3320(b)(2)	Organic HAP emissions are limited to no more than 1.6% of coating applied for each month; or
63.3320(b)(3)	Organic HAP emissions are limited to no more than 8% of solids applied for each month.
40 CFR Part 63, Subpart A	See A.I.2.c
40 CFR Part 64	See A.I.2.d

2. Additional Terms and Conditions

- 2.a** The requirements of this rule are less stringent than the requirements in 40 CFR Part 63 Subpart JJJJ for Paper and other Web Coating.
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart FFF and 40 CFR Part 63 Subparts A and JJJJ.
- 2.c** Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.
- 2.d** Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit.
- 2.e** All PE is considered as particulate matter 10 microns in diameter or less (PM10).

II. Operational Restrictions

- 1.** All of the VOC emissions from emissions units K002, K003, K004, P029, P030 and P031 shall be vented to the regenerative thermal oxidizer (RTO) when one or more of these emissions units are in operation.
- 2.** See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3321(a), Table 1 to Subpart JJJJ of Part 63—Operating Limits if Using Add-On Control Devices and Capture System, and

40 CFR 63.3360(e)(3) for establishing the operating limits during the performance test.

3. The coating line shall be equipped with a permanent total enclosure (PTE)* which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any "Natural Draft Opening" (NDO)* shall be at least 4 equivalent diameters from each VOC emission point;
 - b. the total area of all NDOs shall not exceed 5% 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 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
 - e. all VOC emissions must be captured and vented to the VOC control device.

By satisfying the above criteria for a permanent total enclosure, the VOC capture efficiency shall be assumed to be 100%.

* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

4. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as an hourly average (equivalent to at least 200 feet/minute airflow into the permanent total enclosure through all natural draft openings), whenever the emissions unit is in operation and all the VOCs are being vented to the RTO.

III. Monitoring and/or Recordkeeping Requirements

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1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the RTO, in any 3-hour block of time when the emissions unit(s) controlled by the RTO is/are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.
2. 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 and prior approval by the Northwest District Office.

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

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
- b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

3. Whenever the monitored average combustion temperature within the RTO deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The

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permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- l. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

4. The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
5. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain on a daily basis the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;
 - c. an identification of each incident of deviation described in "b" (above) where a

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- d. prompt investigation was not conducted;
- d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit(s) was/were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.
3. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).
4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.
5. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section A.II.4 of the terms and conditions of this permit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

All quarterly reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

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

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- a. The emission testing shall be conducted within 6 months after commencing operation of this emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC, PE and HAP. Testing shall also be conducted to demonstrate compliance with the mass emission limitations of VOC, PE and individual HAP pollutants.
- c. The following test method(s) shall be employed to demonstrate compliance with the emission limitations: Methods 1-5, 18 and 25 or 25A of 40 CFR Part 60. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
- c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 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 USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
- d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10, 40 CFR Part 60 Subpart JJJJ or an alternative test protocol approved by the Ohio EPA. 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.
- e. The testing shall be conducted while the emissions unit is operating at or near maximum loading conditions, unless otherwise specified or approved by the Northwest District Office. The operating scenario may also require the permittee to test this emissions unit at normal VOC loading conditions to demonstrate worst-case loading conditions.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Northwest District Office shall be permitted to witness the test(s),

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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.

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 Northwest District Office 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 Northwest District Office.

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

- a. Emission Limitation:

2.02 pounds of volatile organic compounds (VOC) per hour and 8.87 tons of VOC per year from adhesive application operations

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

- b. Emission Limitation:

0.54 pounds of MIBK per hour and 2.35 tons of MIBK per year from adhesive application operations

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Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

c. Emission Limitation:

0.37 pounds of VOC per hour and 1.63 tons of VOC per year cleanup materials

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

d. Emission Limitation:

0.37 pounds of toluene per hour and 1.63 tons of toluene per year cleanup materials

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

e. Emission Limitation:

0.67 pounds of VOC per hour and 2.93 tons of VOC per year from embossing with heat operations

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

- f. Emission Limitation:
0.67 pounds of particulate emissions (PE) per hour and 2.93 tons of PE per year from embossing with heat operations

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

The annual limitation was developed by multiplying the potential lbs/hr emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with hourly emission rate, compliance with the annual limitation will be assumed.

- g. Emission Limitation:
Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 2 percent of the organic HAP applied for each month (98 percent reduction) for each month at new affected sources; or

Organic HAP emissions are limited to no more than 1.6% of coating applied for each month; or

Organic HAP emissions are limited to no more than 8% of solids applied for each month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1. and as described in sections 63.3370(e) and 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P031) - Embosser No. 5 consists of three unwind stations, a solvent adhesive station, a lamination station, infra-red heater, embossing station, cooling station and wind-up. The emissions from this emissions unit are exhausted to the RTO.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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SIC CODE 2396 SCC CODE 40201330 EMISSIONS UNIT ID K004
 EMISSIONS UNIT DESCRIPTION Printer No. 5
 DATE INSTALLED 06/1965

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds				8.38	36.71
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **FFF** NESHAP? **JJJJ** PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

RTO and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No - MACT source

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

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SIC CODE SCC CODE EMISSIONS UNIT ID
 EMISSIONS UNIT DESCRIPTION
 DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	plastic film heating natural gas combustion			0.97	4.26 0.13
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	plastic film heating natural gas combustion			0.97	4.26 0.09
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? **No** NESHAP? **No** PSD? **No** OFFSET POLICY? **No**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

CVM Fume Eliminator and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

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Facility ID: 0322020019

SIC CODE 2396 SCC CODE 40201101 EMISSIONS UNIT ID P030
 EMISSIONS UNIT DESCRIPTION Kawakami Laminator
 DATE INSTALLED 06/2008

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	adhesive application cleanup materials			7.53 0.37	33.00 1.63
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					
Xylene	adhesive application			3.10	13.59
MIBK	adhesive application			1.33	5.82
Toluene	cleanup materials			0.37	1.63

APPLICABLE FEDERAL RULES:

NSPS? **FFF** NESHAP? **JJJJ** PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

RTO and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No - MACT source
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

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Facility ID: 0322020019

SIC CODE 2396 SCC CODE 40201101 EMISSIONS UNIT ID P031
 EMISSIONS UNIT DESCRIPTION Embosser No. 5
 DATE INSTALLED 06/2008

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter				0.67	2.93
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	embossing with heat cleanup materials adhesive application			0.67	2.93
				0.37	1.63
				2.02	8.87
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					
MIBK	adhesive application			0.54	2.35
Toluene	cleanup materials			0.37	1.63

APPLICABLE FEDERAL RULES:

NSPS? **FFF** NESHAP? **JJJJ** PSD? No OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
RTO and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No - MACT source
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____