



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 05-12030**

**DATE: 7/30/2002**

Stolle Products  
Bob Ostendorf  
1501 W Michigan Ave  
Sidney, OH 45365

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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

SWDO



**Permit To Install**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**FINAL PERMIT TO INSTALL 05-12030**

Application Number: 05-12030  
APS Premise Number: 0575010106  
Permit Fee: **\$200**  
Name of Facility: Stolle Products  
Person to Contact: Bob Ostendorf  
Address: 1501 W Michigan Ave  
Sidney, OH 45365

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1501 W Michigan Ave**  
**Sidney, Ohio**

Description of proposed emissions unit(s):  
**Department 350 Coating Line.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. 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 reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.10 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

## **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.

## **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 reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## 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 this Permit To Install.

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

## 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.
  - 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 To Install 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 thirty (30) 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**

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.

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

### **1. Compliance Requirements**

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

### **2. Reporting Requirements Related to Monitoring and Recordkeeping 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 quarterly, i.e., 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 of any transfer of this permit.

### **4. Termination of Permit To Install**

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

## **5. Construction of New Sources(s)**

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

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

## **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**

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

**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., 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	27.8

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS****A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

"The permittee will be subject to the upcoming Maximum Achievable Control Technology (MACT) standard for Miscellaneous Metal Parts and Products, 40 CFR Part 63 Subpart Mmmm. U.S. EPA failed to promulgate this standard by May 15, 2002, the MACT hammer date. In accordance with 40 CFR 63 Subpart B (§ 63.50 through § 63.56), the permittee is required to submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application is required to be submitted in two parts: The deadline to submit the Part I application as specified in § 63.53 was May 15, 2002.

If the final MACT Standard is not promulgated by May 15, 2004, the permittee shall submit the Part II application as specified in § 63.53. The Part II application shall provide all pertinent facility information in order to make a case-by-case determination for the source category. It shall be submitted no later than May 15, 2004.

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

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

Applicable Rules/Requirements

K048 - K048 - Department  
350 printing/coating line  
(Terms in this permit  
supersede those identified in  
PTI 05-9516, issued on  
12/03/98)

OAC rule 3745-31-05(A)(3)

	Applicable Emissions <u>Limitations/Control Measures</u>	limitation required by this rule is equivalent to the limitation specified by OAC rule 3745-31-05(D).
OAC 3745-21-09(U)(1)(a)	rule Hourly volatile organic compound (VOC) emissions shall not exceed 15.3 pounds, as a daily average.	See A.2.a.
OAC 3745-21-09(U)(1)(c)	rule The volatile organic compound (VOC) content for the <u>protective coating film</u> shall not exceed 1.2 pounds per gallon of coating, minus water and exempt solvents.	The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following: 1.7 lbs/hr and 7.45 tons/yr NO <sub>x</sub> ; 0.93 lb/hr and 4.05 tons/yr CO; 0.08 lb/hr and 0.35 ton/yr filterable PM;
OAC 3745-21-09(U)(2)(f)	rule The VOC content for <u>ultraviolet nomenclature inks</u> shall not exceed 0.4 pounds per gallon of coating, minus water and exempt solvents.	0.01 lb/hr and 0.03 ton/yr SO <sub>2</sub> ; and 0.12 lb/hr and 0.53 ton/yr VOC. 0.02 lb PE per mmBtu for the drying oven
OAC rule 3745-31-05(D)	The VOC content limitation for <u>cleanup/pan solvent material</u> shall not exceed 7.76 pounds per gallon.	The VOC content for <u>clear coatings</u> shall not exceed 4.3 pounds per gallon, minus water and exempt solvents.
40 CFR Part 63, Subpart MMMM	The VOC content limitation of this rule for <u>"non-compliant" extreme performance coatings</u> is equivalent to the limitation specified in OAC rule 3745-21-09(U)(2)(f).	The VOC content for <u>"compliant" extreme performance coatings</u> shall not exceed 3.5 pounds per gallon, minus water and exempt solvents.
	The VOC content limitation of this rule for <u>clear coatings</u> is equivalent to the limitation specified by OAC rule 3745-21-09(U)(1)(a).	The VOC content for <u>"non-compliant" extreme performance coatings</u> shall not exceed 5.21 pounds per gallon of coating, minus water and exempt solvents.
	The VOC content limitation of this rule for <u>"compliant" extreme performance coatings</u> is equivalent to the limitation specified by OAC rule 3745-21-09(U)(1)(c).	See Section A.2.b. The rolling, 365-day summation of VOC emissions shall not exceed 27.8 tons.
	The rolling, 365-day VOC emission	See Part II.A. of this permit

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Stolle Products

PTI Application: **05 12030**

**Issued**

Facility ID: **0575010106**

Emissions Unit ID: **K048**

## 2. Additional Terms and Conditions

- 2.a** Pursuant to OAC rule 3745-21-09(U)(2)(f), the best available technology has been determined to be extreme performance coatings that have a VOC content greater than the limitations of OAC rules 3745-21-09(U)(1)(c).
- 2.b** The emission limitations for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC from combustion of natural gas and/or propane in the drying ovens is established to reflect potential to emit for this emissions unit. Therefore, record keeping and reporting requirements are not necessary to ensure compliance with these limits.

## II. Operational Restrictions

1. The maximum annual clear coating usage for this emissions unit shall not exceed 2,300 gallons based upon a rolling, 365-day summation of the coating usage figures.
2. The maximum annual "non-compliant"extreme performance coating usage for this emissions unit shall not exceed 1,700 gallons based upon a rolling, 365-day summation of the coating usage figures.
3. The maximum annual extreme performance coatings usage, combined for "compliant" and "non-compliant" coatings, for this emissions unit shall not exceed 4,800 gallons based upon a rolling, 365-day summation of the coating usage figures.
4. The maximum annual protective coating film usage for this emissions unit shall not exceed 8,100 gallons based upon a rolling, 365-day summation of the coating usage figures.
5. The maximum annual ultraviolet nomenclature inks usage for this emissions unit shall not exceed 1,500 gallons based upon a rolling, 365-day summation of the coating usage figures.
6. The maximum annual cleanup/pan solvent material usage for this emissions unit shall not exceed 4,000 gallons based upon a rolling, 365-day summation of the material usage figures. This limitation is based upon past records that indicate a material recovery rate of at least 50 percent.
7. The permittee shall burn only natural gas or propane in this emissions unit.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

- a. the name and identification number of each coating, ink, and cleanup/pan solvent material, as applied;
  - b. the VOC content of each coating and ink, minus water and exempt solvents, as applied;
  - c. the VOC content of each cleanup/pan solvent material employed;
  - d. the volume in gallons of each coating and ink employed;
  - e. the volume in gallons of each cleanup/pan solvent material employed;
  - f. the daily VOC emissions from the coatings, inks, and cleanup/pan solvent materials employed, i.e., multiply the daily volume, in gallons, of each coating, ink and cleanup/pan solvent material employed by its respective VOC content less water and exempt solvents, and summarize the results;
  - g. the number of hours operated;
  - h. the average hourly VOC emissions rate, i.e., the results determined in (f) divided by (g);
  - i. the rolling, 365-day usage summation for each type of coating, ink and cleanup/pan solvent material employed;
  - j. the rolling, 365-day summation of VOC emissions from the coating, ink, and cleanup/pan solvent material employed, prior to any credit for recovered materials; and
  - k. if a credit from recovered materials is applied, the rolling, 365-day summation of VOC emissions from the coating, ink, and cleanup/pan solvent material employed, less the total emissions credit from recovered materials shipped during the 365-day period (Section III.1.j - Section III.2.e).
2. If a credit for recovered cleanup/pan solvent material is used to demonstrate compliance and/or used in the calculation of rolling, 365-day emission calculations, the permittee shall maintain the following records for the recovered cleanup/pan solvent material, and the recovery drum or tank serving this emissions unit:
- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
  - b. the total amount of material collected and shipped for recycle/recovery and/or disposal at

- an outside facility, in gallons, on the day it is shipped;
- c. a record of the VOC content of each cleanup/pan solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
  - d. the mass (lbs) of VOC to be credited to the rolling, 365-day emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup/pan solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit; and
  - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 365-day period.
3. For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

#### IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing the use of noncomplying coatings, inks and/or cleanup/pan solvent material. In addition, the permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing an exceedance of the average hourly VOC emissions limitations (15.3 lbs). These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
  - a. the rolling, 365-day emission limitation for volatile organic compounds (27.8 tons);
  - b. the rolling, 365-day usage limitation for clear coating (2,300 gallons);
  - c. the rolling, 365-day usage limitation for "non-compliant" extreme performance coating (1,700 gallons);
  - d. the rolling, 365-day usage limitation for extreme performance, combined for "compliant" and "non-compliant", (4,800 gallons);
  - e. the rolling, 365-day usage limitation for protective coating film (8,100 gallons);

- f. the rolling, 365-day usage limitation for ultraviolet nomenclature inks (1,500 gallons); and
- g. the rolling, 365-day usage limitation for cleanup/pan solvent material (4,000 gallons).

These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions A.1.c.

- 3. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any daily record showing the use of a fuel other than natural gas or propane was burned in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

## V. Testing Requirements

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

- 1. Volatile Organic Compound Concentration Limitations:

4.3 lbs VOC per gallon of clear coating, minus water and exempt solvents;  
3.5 lbs VOC per gallon of "compliant" extreme performance coating, minus water and exempt solvents;  
5.21 lbs VOC per gallon of "non-compliant" extreme performance coating, minus water and exempt solvents;  
1.2 lbs VOC per gallon of protective coating film, minus water and exempt solvents;  
0.4 lbs VOC per gallon of ultraviolet nomenclature ink, minus water and exempt solvents; and  
7.76 lbs per gallon of cleanup/pan solvent material

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings. The record keeping requirements contained in Section III.1 shall demonstrate that only materials with these VOC content limitations are applied.

- 2. Emissions Limitation:

15.3 pounds VOC per day, as a daily average

Applicable Compliance Method:

Compliance shall be determined, on a daily basis, by multiplying the VOC content of each coating material, ink and cleanup/pan solvent employed by the respective VOC content, minus water and

exempt solvents, summarizing the products, and dividing the results by the number of hours operated. Compliance shall be demonstrated through the record keeping as specified in Section III.1 and also Section III.2 if a credit for recovered materials is to be applied.

3. Emissions Limitation:

27.8 tons VOC as a rolling, 365-day summation

Applicable Compliance Method:

Compliance shall be determined by the daily record keeping as specified in Section III.1, less any recovered materials where records were maintained as required in Section III.2.

## 4. Emission Limitation:

The combined emissions from natural gas and propane combustion in the drying ovens shall not exceed the following:

1.7 lbs/hr and 7.45 tons/yr NO<sub>x</sub>;  
0.93 lb/hr and 4.05 tons/yr CO;  
0.08 lb/hr and 0.35 ton/yr filterable PM;  
0.01 lb/hr and 0.03 ton/yr SO<sub>2</sub>; and  
0.12 lb/hr and 0.53 ton/yr VOC.

## Applicable Compliance Method:

Compliance with the limits for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/10<sup>6</sup> scf) multiplied by the maximum hourly gas burning capacity of the burners (three at 3 mmBtu/hr and one at 2 mmBtu/hr) and times 1 scf/1000 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

Compliance with the limits for propane combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.5-1 (10/96). These emission factors (lb pollutant/10<sup>3</sup> gallons) multiplied by the maximum hourly gas burning capacity of the burners (three at 3 mmBtu/hr and one at 2 mmBtu/hr) and divided by the 91.5 MMBtu/10<sup>3</sup> gallons shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

## 7. Emission Limitation:

0.02 lb PE per mmBtu for the drying oven

## Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit. If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

## VI. Miscellaneous Requirements

For the purpose of this permit, the following definitions shall apply:

1. "compliant" extreme performance coatings are defined as extreme performance coatings that comply with the VOC content limitation as specified in OAC rule 3745-21-09(U)(1)(c); and
2. "non-compliant" extreme performance coatings are defined as extreme performance coatings that exceed the VOC content limitation as specified in OAC rule 3745-21-09(U)(1)(c), but comply with the VOC content limitation as determined by OAC rule 3745-21-09(U)(2)(f).

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K048 - Department 350 printing/coating line (Terms in this permit supersede those identified in PTI 05-9516, issued on 12/03/98.		

**2. Additional Terms and Conditions****2.a** None**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit K048 was evaluated based on the actual materials (coatings, inks, and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Stolle

PTI A<sub>1</sub>

**Issued: 7/30/2002**

Emissions Unit ID:**K048**

Pollutant: Isophorone

STEL (ug/m3): 28,263.8

Maximum Hourly Emission Rate (lbs/hr): 16.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 174.3

MAGLC (ug/m<sup>3</sup>): 206.36

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **IV. Reporting Requirements**

None

#### **V. Testing Requirements**

None

#### **VI. Miscellaneous Requirements**

None