

Synthetic Minor Determination and/or Netting Determination

Permit To Install **06-07864**

A. Source Description

International Converter Inc. is proposing to construct a new Laminating Line #7 (K010) consisting of C1 (wet coating station); Laminator 1 (dry bond station); Laminator 2 (wet bond station); CP-1 (coating station); CP-2 (coating station); CP-3 (coating station); and overhead dryer. International Converter is requesting federally enforceable limits in the PTI to limit the Potential to Emit (PTE) of volatile organic compounds (VOC) in order for the facility to remain a minor facility and avoid PSD review and becoming a major facility. International Converter is requesting a line limit of 51.42 tons per year of VOC and maintenance of the facility cap of 249.0 tons per year of VOC.

B. Facility Emissions and Attainment Status

The facility is in Caldwell, Ohio, which is located in Noble County. This area is classified as attainment for all of the criteria pollutants, particulate matter less than 10 microns (PM10), sulfur dioxide, nitrogen oxides, carbon monoxide, volatile organic compounds (ozone) and lead.

C. Source Emissions

The following table shows the net emissions decreases due to the proposed project, the decreases associated with the shutdown of Laminator #1 (K001) and Laminator #5 (K005), the net change in emissions and the PSD Threshold level.

Project Emissions (TPY)	VOC
Project Increases (K010)	51.42
K001 Shutdown	-6.84
K005 Shutdown	-68.44
Net Change	-23.86
PSD Major Facility Threshold Level	250

D. Conclusion

International Converter is currently classified as a minor stationary source under Prevention of Significant Deterioration (PSD) regulations (40 CFR 52.21). PSD is not triggered for the proposed project because of the results of the contemporaneous review, including the netting exercise and the proposed voluntary emission limits (annual facility cap on VOC emissions of 249.0 tons per year) and the shutdown of K001 and K005. The Caldwell facility is not located in a non-attainment area, so Non-Attainment New Source Review does not apply.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
NOBLE COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 06-07864

Fac ID: 0661000027

DATE: 10/13/2005

International Converter, Inc.-Caldwell
Ronald Bedard
2443 Courtyard Circle 6
Aurora, IL 605066618

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: USEPA

SEDO

WV

PA

NOBLE COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07864 FOR AN AIR CONTAMINANT SOURCE FOR
International Converter, Inc.-Caldwell**

On 10/13/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **International Converter, Inc.-Caldwell**, located at **17153 County Road 157, Caldwell, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07864:

Laminator no. 7.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Bruce Weinberg, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 06-07864

Application Number: 06-07864
Facility ID: 0661000027
Permit Fee: **To be entered upon final issuance**
Name of Facility: International Converter, Inc.-Caldwell
Person to Contact: Ronald Bedard
Address: 2443 Courtyard Circle 6
Aurora, IL 605066618

Location of proposed air contaminant source(s) [emissions unit(s)]:
**17153 County Road 157
Caldwell, Ohio**

Description of proposed emissions unit(s):
Laminator no. 7.

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

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

International Converter, Inc.-Caldwell

Facility ID: 0661000027

PTI Application: 06-07864

Issued: To be entered upon final issuance

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.8 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.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain,

International Converter, Inc.-Caldwell

Facility ID: 0661000027

PTI Application: 06-07864

Issued: To be entered upon final issuance

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.

International Converter, Inc.-Caldwell

Facility ID: 0661000027

PTI Application: 06-07864

Issued: To be entered upon final issuance

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.

International Converter, Inc.-Caldwell
PTI Application: 06-07864
Issued: To be entered upon final issuance

Facility ID: 0661000027

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.
 - 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

International Converter, Inc.-Caldwell

Facility ID: 0661000027

PTI Application: 06-07864

Issued: To be entered upon final issuance

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

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.

International Converter, Inc.-Caldwell
PTI Application: 06-07864
Issued: To be entered upon final issuance

Facility ID: 0661000027

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.

International Converter, Inc.-Caldwell
PTI Application: 06-07864
Issued: To be entered upon final issuance

Facility ID: 0661000027

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 of any transfer of this permit.

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

International Converter, Inc.-Caldwell

Facility ID: 0661000027

PTI Application: 06-07864

Issued: To be entered upon final issuance

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

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

International Converter, Inc.-Caldwell

Facility ID: 0661000027

PTI Application: 06-07864

Issued: To be entered upon final issuance
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.

International Converter, Inc.-Caldwell
PTI Application: 06-07864
Issued: To be entered upon final issuance

Facility ID: 0661000027

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	51.42

International Converter, Inc.-Caldwell

Facility ID: 0661000027

PTI Application: 06-07864

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None.

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

None.

**Intern
PTI A**

Emissions Unit ID: K010

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K010 - Laminator No. 7 controlled with a catalytic incinerator.	OAC rule 3745-31-05(A)(3)	Emissions of Volatile Organic Compounds (VOC) shall be vented to the catalytic incinerator with a capture efficiency of at least 90% by weight and a control efficiency which is at least 90% by weight.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 20 and 3745-21-09(Y)(1)(b). VOC emissions shall not exceed 11.74 lbs/hr and 51.42 TPY.
	OAC rule 3745-21-09(Y)(1)(b)	Emissions of VOC shall not exceed 249.0 tons during any rolling 12-month period from the entire facility, which is comprised of K002, K003, K004, K006, K007, K008, K009, K010 and all other emission sources at the facility, including but not limited to de minimus, exempt and combustion sources.

International Converter, Inc.-Caldwell
PTI Application: 06 07864
Issue

Facility ID: 0661000027

Emissions Unit ID: K010

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Intern
PTI A**

Emissions Unit ID: K010

Issued: To be entered upon final issuance

2. Additional Terms and Conditions

- 2.a** Potential emissions from de minimus and exempt sources are less than one ton of VOC per year, combined.

II. Operational Restrictions

1. Total VOC in raw material used at this facility, as defined in Section III.4., shall not exceed 249.0 tons, calculated as a 12-month rolling summation.
2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.

III. Monitoring and/or Recordkeeping Requirements

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

The permittee shall collect and record the following information each day 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 thermal incinerator, 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.
- c. all 3-hour blocks of time (when the emissions unit was in operation) during which

**Intern
PTI A**

Emissions Unit ID: K010

Issued: To be entered upon final issuance

the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the name and identification of each cleanup material employed;
 - e. the number of gallons of each cleanup material employed;
 - f. the VOC content of each cleanup material, in pounds per gallon;
 - g. the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons; and
 - h. the calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test).
3. The permittee shall maintain monthly records of the rolling, 12-month summation of VOC emissions from all emission units located at the facility.
4. The permittee shall maintain monthly records of the rolling 12-month summation of VOC in raw material usage from all emission units located at the facility, defined as: the summation, for all emission units, of [(VOC content of each coating used)(quantity of that coating used)(control efficiency as measured by the latest stack test on that unit, if that coating was vented through control equipment) + (VOC content of each cleanup material used)(quantity of that cleanup material used)(control efficiency as measured by the latest stack test on that unit, if that cleanup material was vented through control equipment) + total VOC emissions from all de minimus, exempt, and combustion sources].

IV. Reporting Requirements

International Converter, Inc.-Caldwell
PTI Application: 06-07864
Issue:

Facility ID: 0661000027

Emissions Unit ID: K010

1. The permittee shall submit quarterly summaries of the following records:

The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time, when the emissions unit was in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed did not comply with the temperature limitations specified in this permit. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

2. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month VOC emission limitations. These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

V. Testing Requirements

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

- 1.a Emission Limitation:

Emissions of VOC shall be vented to the catalytic incinerator with a capture efficiency of at least 90% by weight and a control efficiency which is at least 90% by weight

Applicable Compliance Method:

Compliance with the capture and control efficiency limitations shall be demonstrated based upon the applicable emission tests specified in section A.V.2.

- 1.b Emission Limitation:

VOC emissions shall not exceed 11.74 lbs/hr and 51.42 TPY.

Applicable Compliance Method:

Compliance with the lbs/hr VOC emissions limitation shall be demonstrated by the testing requirements specified in section A.V.2.

USEPA Method 24, 24A, or formulation data shall be used to determine the VOC content of each coating and ink employed. Formulation data shall be used to determine

**Intern
PTI A**

Emissions Unit ID: K010

Issued: To be entered upon final issuance

the VOC content of each cleanup material.

Compliance with the tons per year emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours per year and 2000 lbs per ton.

1.c Emission Limitation:

Emissions of VOC shall not exceed 249.0 tons during any rolling 12-month period from the entire facility, which is comprised of K002, K003, K004, K006, K007, K008, K009, K010 and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emissions limitation shall be demonstrated based upon the record keeping requirements specified in section A.III.

2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
 - b. the emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC;
 - c. the emission testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 for Volatile Organic Compounds;
Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. the emissions testing shall be conducted while the emissions unit is operating at or near its maximum capacity and in accordance with OAC rule 3745-21-10(C), unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the

International Converter, Inc.-Caldwell

Facility ID: 0661000027

PTI Application: 06-07864

Issue:

Emissions Unit ID: K010

emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be submitted to the Ohio EPA Southeast District Office within one month following completion of the tests. The permittee may obtain additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

VI. Miscellaneous Requirements

None.

Intern
PTI A

Emissions Unit ID: K010

Issued: To be entered upon final issuance

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>
K010 - Laminator No. 7	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.