

Synthetic Minor Determination and/or Netting Determination

Permit To Install: **06-08166**

A. Source Description

RJF International is proposing the installation of a new vinyl coating line at their existing facility. The new source would be subject to 40 CFR Part 60, Subpart FFF, and OAC rule 3745-21-09(H).

B. Facility Emissions and Attainment Status

The facility is located in Washington County, which is currently non-attainment for ozone (8-hour). The facility is currently operating under Federally Enforceable State Operating Permits that limit the combined emissions from coating lines K003, K004, K005, K007, K008, K011 and K012 to no more than 65.4 tpy of VOC. There are other sources of VOC existing at the facility as well, but the facility Potential to Emit (PTE) for all sources, considering the FESOP limits, is below the 100 tpy major source threshold. Actual emissions are far below the regulatory threshold (31 tons OC emissions reported on fee report for 2005). The facility PTE analysis for HAP's indicates that the potential HAP emissions are well below the 10 tpy single HAP and 25 tpy combined HAP thresholds as well.

To maintain the facility PTE below major source thresholds and provide for additional flexibility in considering future equipment additions, the facility has requested that this permit to install contain synthetic minor emissions limitations to reduce the combined VOC emissions from coating lines at the facility below the emissions limits contained in the current FESOP's. The proposed synthetic minor limitations would limit VOC emissions from the new line (K013) and existing lines K003, K004, K005, K007, K008, K011, and K012, combined, to 50.0 tpy. This would result in a net reduction from the current synthetic minor emissions limits even with the addition of the new line. It would also result in a net reduction in the facility-wide PTE for VOC.

C. Source Emissions

As indicated above, the proposed synthetic minor emissions limitations would result in a reduction in the allowable coating line emissions and the facility VOC PTE. Compliance with the synthetic minor limitations would be demonstrated through detailed coating usage records maintained by the facility.

D. Conclusion

The synthetic minor PTI would allow installation of the new vinyl coating line while reducing the combined allowable coating line emissions and facility PTE for VOC. Compliance with the limitations would be demonstrated through coating usage records. Since the limits in the PTI are more stringent than those in the current FESOPs, compliance with the FESOPs would be assured through compliance with the limits in this PTI. The synthetic minor emissions limitations herein can subsequently be incorporated into state PTO's for the other affected coating lines.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 06-08166

Fac ID: 0684020020

DATE: 10/24/2006

RJF International Corp Marietta Plant
Joe Kunze
BF Goodrich Rd. PO Box 657
Marietta, OH 45750

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

WASHINGTON COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-08166 FOR AN AIR CONTAMINANT SOURCE FOR
RJF International Corp Marietta Plant**

On 10/24/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **RJF International Corp Marietta Plant**, located at **BF Goodrich Rd., Marietta, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-08166:

New printer.

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 06-08166

Application Number: 06-08166
Facility ID: 0684020020
Permit Fee: **To be entered upon final issuance**
Name of Facility: RJF International Corp Marietta Plant
Person to Contact: Joe Kunze
Address: BF Goodrich Rd. PO Box 657
Marietta, OH 45750

Location of proposed air contaminant source(s) [emissions unit(s)]:

**BF Goodrich Rd.
Marietta, Ohio**

Description of proposed emissions unit(s):

New printer.

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

RJF International Corp Marietta Plant
PTI Application: 06-08166
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0684020020

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

RJF International Corp Marietta Plant
PTI Application: 06-08166
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Facility ID: 0684020020

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

Emissions Unit ID: K013

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	50.0 (Emissions Units K003, K004, K005, K007, K008, K011, K012, and K013 Combined)

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

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

Operations, Property, and/or Equipment - (K013) - 9 Printer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1,620 pounds per day.</p> <p>The VOC content of the coatings (including inks) employed in this emissions unit shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.</p> <p>VOC emissions from this emissions unit shall not exceed 50.0 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart FFF.</p>
OAC rule 3745-31-05(C)	Total annual VOC emissions from emissions units K003, K004, K005, K007, K008, K011, K012, and K013, combined, shall not exceed 50.0 tons per year, including cleanup materials, based on a rolling, 12-month summation.
40 CFR Part 60, Subpart FFF	<p>The weighted average VOC content of all inks employed in this emissions unit shall be less than 1.0 kilogram VOC per kilogram of ink solids.</p> <p>See sections A.2.a and A.2.b below.</p>
OAC rule 3745-21-09(H)	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a For the purpose of determining compliance with the requirements of 40 CFR Part 60, Subpart FFF, an ink is defined as any mixture of ink, coating solids, organic solvents including dilution solvent, and water that is applied to the web of flexible

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vinyl or urethane on a rotogravure printing line.

- 2.b** All inks employed in this emissions unit contain less than 1.0 kilogram VOC per kilogram ink solids. Therefore, it is not necessary to maintain records of the weighted average VOC content.

- 2.c** The restricted VOC usage/emission limitations specified in sections A.1 and B.1, in turn, restrict the HAP emissions from emissions units K003, K004, K005, K007, K008, K010, K012, and K013. The restricted HAP emissions from these emissions units were added to the HAP potential to emit emissions for all other sources at the facility. Using this approach, the HAP emissions will not exceed the individual and combined HAP emission thresholds of 10 and 25 tons, respectively. Therefore, no additional terms and conditions are necessary to further restrict the HAP emissions from this facility (in addition, please see section F.1.)

B. Operational Restrictions

- 1. The maximum annual volatile organic material usage from coatings (including inks and adhesives) and cleanup materials for emissions units K003, K004, K005, K007, K008, K010, K012, and K013, combined, shall not exceed 50.0 tons, based upon a rolling, 12-month summation of the volatile organic material usage figures. The permittee shall comply with this limitation upon issuance of this permit through the use of past operating records.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information on a monthly basis for emissions units K003, K004, K005, K007, K008, K011, K012, and K013:
 - a. the name and identification of each coating (including inks and adhesives) and cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents;
 - e. the number of gallons of each coating employed;

Emissions Unit ID: **K013**

- f. the total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., the summation of the values from (b) x (c) + the summation of the values from (d) x (e)); and
 - g. the rolling, 12-month summation of VOC emissions from all coatings and cleanup materials employed, in tons.
2. The permittee shall collect and record the following information on a monthly basis for this emissions unit:
 - a. the name and identification of each coating (including inks), and cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents;
 - e. the VOC content of each ink, in kilograms per kilogram of ink solids;
 - f. the number of gallons of each coating employed; and
 - g. the total VOC emissions from all coatings and cleanup materials employed, in tons.
3. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings 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:

Compound: 2-butoxyethanol

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TLV (mg/m³): 97

Maximum Hourly Emission Rate (lb/hr): 0.78

Predicted 1-Hour Maximum Ground-Level
Concentration (mg/m³): 0.320

MAGLC (mg/m³): 2.425

4. 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.).

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.

5. The permittee shall collect, record, and retain the following information when it

Emissions Unit ID: **K013**

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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Ohio EPA Southeast District Office that identify any monthly record showing:
 - a. the use of noncomplying coatings or inks (i.e., for VOC content);
 - b. an exceedance of the rolling, 12-month combined VOC emission limitation for K003, K004, K005, K007, K008, K011, K012, and K013; and/or
 - c. an exceedance of the daily VOC emission limitation for this emissions unit.
2. Deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:

VOC emissions shall not exceed 1,620 pounds per day.

Applicable Compliance Method:

This emission limitation was established at the emissions unit's potential to emit using the highest VOC content coating and maximum coating usage rate over a

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24-hour period. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.

b. Emission Limitation:

The VOC content of the coatings (including inks) employed in this emissions unit shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping required in section C.2.d.

c. Emission Limitation:

Total VOC emissions from emissions units K003, K004, K005, K007, K008, K011, K012, and K013, combined, shall not exceed 50.0 tons per year, including cleanup materials, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the combined annual VOC emission limitation shall be demonstrated through the record keeping required in section C.1.g.

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d. Emission Limitation:

The weighted average VOC content of any ink employed in this emissions unit shall be less than 1.0 kilogram VOC per kilogram of ink solids.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated through the record keeping required in section C.2.e.

2. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. Based on information provided by the permittee, the facility Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings/inks used. If any changes in the operations and/or coating/ink formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.