



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/29/2013

GORDON BARR
NEWKOR, INC.
10410 BEREA RD.
CLEVELAND, OH 44102

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318005362
Permit Number: P0108533
Permit Type: Renewal
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
CDAQ; Pennsylvania; Canada

PUBLIC NOTICE
3/29/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

NEWKOR, INC.
10410 BEREA RD.,
Cleveland, OH 44102
Cuyahoga County

FACILITY DESC.: Fiber Can, Tube, Drum, and Similar Products Manufacturing

PERMIT #: P0108533

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO renewal permit for two 2.2 mmBtu/hr Midland Ross natural gas-fired baking ovens (P001 and P003), and an associated dipping room consisting of two 4,000-gallon in-ground saturation tanks with drying room (P004). This renewal permit will be a first issue FEPTIO to avoid Title V.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination (FEPTIO to avoid Title V)

Netting Determination

2. Source Description:

NewKor, Inc. produces paper tubes (cores) for various industries (shipping, paint rollers, electric insulating, etc.). Cores produced may either be plain paper cores or those which are processed through the facility's resin solution impregnation dipping process.

Cores allocated to the resin solution impregnation dipping process are immersed in a phenolic resin and acetone solution. The facility combines one gallon of acetone with one gallon of phenolic resin resulting in an as applied solution. The as applied solution is comprised of the following materials (% by weight concentration):

7.97 lbs/gallon (as applied) - 50% acetone; 0.25% formaldehyde; 12.5% methanol; 5.75% phenol; and 31.5% water and exempt solvents

Clean bulk rolled paper is first formed (wound) into a core, cut to length, and placed vertically into a dip rack. The dip rack may hold up to 800 cores depending on core diameter. The core filled rack is then immersed in one of two 4,000 gallon in-ground dipping tanks containing the resin solution for approximately 2 to 3 hours (or until completely saturated). Saturated cores are then temporarily drip dried on drying boards in the dipping room before being moved to a drying room for an additional air drying time of forty-eight hours. The dipping and drying rooms are each continuously vented/exhausted to the atmosphere by their own 5,000 ACFM explosion proof fan.

The core filled rack is then moved into one of two drying ovens. Each oven can process a maximum of two racks at one time (per batch) and both ovens may be operated simultaneously. The amount of time racks remain in the ovens for processing is on average five hours. Upon completion of the drying and baking cycle in the oven, the cores are removed and allowed to cool down to ambient temperature. The facility operates sixteen hours per day and processes three batches (six core-filled racks) per oven per day. The finished cores have a hardness and rigidity similar to that of bake-lite.

Emissions are generated at all three stages of the resin solution impregnation process (dipping, drying, and baking).

3. Facility Emissions and Attainment Status:

Cuyahoga County is currently in non-attainment for PM_{2.5}, ozone, and partial attainment for lead.

This facility was originally permitted as a minor source prior to 1974. The facility is also operating under expired state operating permits. As a result of odor complaint investigations, examination of material usage rates, and facility inspections, it was determined that NewKor's actual individual HAP and combined HAP emissions rates were above Title V thresholds.



VOC emissions reported for 2010 were reported to be 10 or more but less than 50 tons per year.

4. Source Emissions:

The facility's potential to emit for volatile organic compounds (VOC), individual hazardous air (HAP), and combined HAPs are above the Title V thresholds.

To avoid Title V permitting requirements, the facility will need to limit the amount of impregnating resin solution and the pre-dip dry weight of the total number of cores processed through the resin solution impregnation process.

The following federally enforceable usage limitations will allow NewKor, Inc. to avoid Title V permitting requirements:

- a. 8,449.5 gallons of phenolic resin per rolling, 12-month period through the resin solution impregnation dipping process;
- b. 8,449.5 gallons of acetone per rolling, 12-month period through the resin solution impregnation dipping process; and
- c. 149,650 pounds of cores through the resin solution impregnation dipping process per rolling, 12-month period, based on the pre-dip dry weight of the cores.

The annual limitations (above) for acetone, phenolic resin, and pounds of cores processed were determined through mass balance testing (conducted 6/27/2011) data submitted to Ohio EPA by NewKor, Inc. and received by the Cleveland Division of Air Quality (Cleveland DAQ) on 7/7/2011.

The limitations noted above will limit the facility's individual HAP emissions to 6.09 (phenol) tons per year and combined HAP and VOC emissions to 9.02 tons per year.

The established emission limitations and core weight usage limitations are based on the amount of cores that may be processed through P001 and P003 per day to maintain compliance with OAC rule 3745-21-07(M)(4) which limits VOC emissions to 3 lbs/hr and 15 lbs/day for each emissions unit.

Facility-wide Allowable Emissions (TPY) P001 and P003 Demonstrating Compliance with OAC rule 3745-21-07(M)(4)						
Unit	Solution Emitted	Acetone	Formaldehyde	Methanol	Phenol	Water/Exempt Solvents
P001	14.6	7.3	0.04	1.83	0.84	4.60
P003	14.6	7.3	0.04	1.83	0.84	4.60
P004	19.45	9.73	0.05	2.43	1.12	6.13
Total	48.65	24.33	0.13	6.09	2.8	15.33

5. Conclusion:

Through federally enforceable material usage limitations, the PTE for VOC, individual HAP, and combined HAPs will be restricted below Title V thresholds based on the rolling, 12-month summation of material usage.

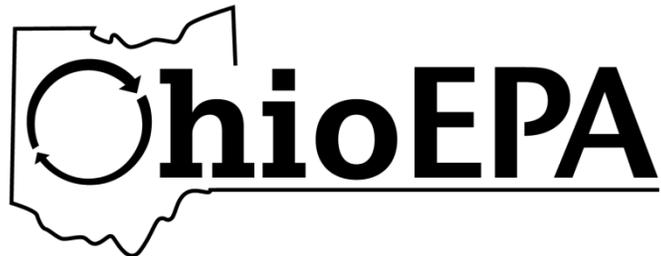


6. Please provide additional notes or comments as necessary:

None.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
Formaldehyde	0.13
Methanol	6.09
Phenol	2.8
Total VOC	9.02



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
NEWKOR, INC.**

Facility ID:	1318005362
Permit Number:	P0108533
Permit Type:	Renewal
Issued:	3/29/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



**Division of Air Pollution Control
Permit-to-Install and Operate
for
NEWKOR, INC.**

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Draft Permit-to-Install and Operate

NEWKOR, INC.

Permit Number: P0108533

Facility ID: 1318005362

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1318005362
Application Number(s): A0042274
Permit Number: P0108533
Permit Description: FEPTIO renewal permit for two 2.2 mmBtu/hr Midland Ross natural gas-fired baking ovens (P001 and P003), and an associated dipping room consisting of two 4,000-gallon in-ground saturation tanks with drying room (P004). This renewal permit will be a first issue FEPTIO to avoid Title V.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/29/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

NEWKOR, INC.
10410 BEREA RD.
Cleveland, OH 44102

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108533

Permit Description: FEPTIO renewal permit for two 2.2 mmBtu/hr Midland Ross natural gas-fired baking ovens (P001 and P003), and an associated dipping room consisting of two 4,000-gallon in-ground saturation tanks with drying room (P004). This renewal permit will be a first issue FEPTIO to avoid Title V.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P004
Company Equipment ID:	Dipping and Drying Rooms
Superseded Permit Number:	P0055205
General Permit Category and Type:	Not Applicable

Group Name: Two Curing & Baking Ovens

Emissions Unit ID:	P001
Company Equipment ID:	OVEN # 2 (FORMERLY KNOWN AS OVEN # 1)
Superseded Permit Number:	P0055203
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	OVEN #1 (FORMERLY KNOWN AS OVEN #2)
Superseded Permit Number:	P0055204
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

NEWKOR, INC.

Permit Number: P0108533

Facility ID: 1318005362

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate

NEWKOR, INC.

Permit Number: P0108533

Facility ID: 1318005362

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install/operate issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

g) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

h) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) c)(1)a., d)(1) through (3), e)(1) and e)(2), f)(1), and g)(1)a., g)(1)b., and g)(1)c..

i) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b)	VOC emissions shall not exceed 9.02 tons per rolling, 12-month period. Individual hazardous air pollutant (HAP) emissions shall not exceed 6.09 tons per rolling, 12-month period. Combined HAP emissions shall not exceed 9.02 tons per rolling, 12-month period.

(2) Additional Terms and Conditions

a. None.

j) Operational Restrictions

(1) The permittee shall not use more than 149,650 pounds of cores per rolling, 12-month period in the resin solution impregnation (dipping) process, based on the pre-dip dry weight of the cores.

(2) The permittee shall not use more than 8,449.50 gallons of acetone per rolling, 12-month period in the resin solution impregnation (dipping) process.



- (3) The permittee shall not use more than 8,449.50 gallons of phenolic resin per rolling, 12-month period in the resin solution impregnation (dipping) process.

k) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following:
 - a. the identification and total number of each different type of core used in the resin solution impregnation process;
 - b. the pre-dip dry weight, in pounds, of each different type of core;
 - c. the total amount, in pounds, of each different type of core determined by multiplying e)(1)a. by e)(1)b. for each type of core;
 - d. the total amount, in pounds, of all cores used in the resin solution impregnation process determined by summing the amount of cores for each core type determined in e)(1)c. for all cores processed;
 - e. the rolling, 12-month summation of the total amount, in pounds, of all cores used in the resin solution impregnation process, based on the pre-dip dry weight;
 - f. the amount, in gallons, of acetone purchased;
 - g. the amount, in gallons, of acetone used in the resin solution impregnation process;
 - h. the rolling, 12-month summation of acetone used in the resin solution impregnation process, in gallons;
 - i. the amount, in gallons, of phenolic resin purchased;
 - j. the amount, in gallons, of phenolic resin used in the resin solution impregnation process; and
 - k. the rolling, 12-month summation of the phenolic resin used in the resin solution impregnation process, in gallons.
- (2) For each different type of core processed at this facility, the permittee shall determine the pre-dip dry weight, in pounds, of each different type of core as measured with a representative of the Cleveland Division of Quality present to verify the weight. The permittee shall maintain a permanent record that provides the identification and associated weight of each different type of core. The compilation of the current core identifications and weights shall be completed within 30 days after issuance of this permit.

l) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:



- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. exceedance of the 149,650 pounds of cores per rolling, 12-month period limitation for the resin solution impregnation (dipping) process, based on the pre-dip dry weight of the cores;
 - ii. exceedance of the 8,499.50 gallons of acetone per rolling, 12-month period limitation for the resin solution impregnation (dipping) process; and
 - iii. exceedance of the 8,499.50 gallons of phenolic resin per rolling, 12-month period limitation for the resin solution impregnation (dipping) process.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.

- (2) The permittee shall submit notification to the Cleveland Division of Air Quality of any new cores processed that involve using different core sizes and weights. The notification shall be submitted within 15 days prior to the use of any new core. The pre-dip dry weight, in pounds, for any new cores shall be measured with a representative of the Cleveland Division of Air Quality present to verify the weight.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



g) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 9.02 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined through the recordkeeping and monitoring requirements specified in e)(1) above and using the emission factor determined from the mass balance analysis performed on 6/27/2011 as follows:

$$\frac{\text{total pounds of cores}}{\text{rolling, 12 - months}} \times \frac{0.65 \text{ lb solution emitted}}{\text{lb core}} = \frac{\text{lb solution emitted}}{\text{rolling, 12 - months}}$$

$$\frac{\text{lb solution emitted}}{\text{rolling, 12 - months}} \times \frac{\text{lb VOC}}{\text{lb solution}} \times \frac{\text{ton}}{2000 \text{ lbs}} = \frac{\text{tons VOC}}{\text{rolling, 12 - months}}$$

The current resin solution consists of 0.25% formaldehyde, 12.5% methanol, and 5.75% phenol for a total VOC content of 18.5% by weight (0.185 lb VOC/lb resin solution).

b. Emission Limitation:

Individual HAP emissions shall not exceed 6.09 TPY.

Applicable Compliance Method:

Compliance shall be determined through the recordkeeping and monitoring requirements specified in e)(1) above and using the emission factor determined from the mass balance analysis performed on 6/27/2011 as follows:

$$\frac{\text{total pounds of cores}}{\text{rolling, 12 - months}} \times \frac{0.65 \text{ lb solution emitted}}{\text{lb core}} = \frac{\text{lb solution emitted}}{\text{rolling, 12 - months}}$$

$$\frac{\text{lb solution emitted}}{\text{rolling, 12 - months}} \times \frac{\text{lb HAP}}{\text{lb solution}} \times \frac{\text{ton}}{2000 \text{ lbs}} = \frac{\text{tons HAP}}{\text{rolling, 12 - months}}$$

The emissions factor of 0.65 lb solution emitted/lb core processed was determined through mass balance data, and applies to all stages of the resin solution impregnation process (dipping, air drying, oven drying, and oven baking).

The current resin solution consists of 0.25% formaldehyde, 12.5% methanol, and 5.75% phenol by weight (lb HAP/lb resin solution).

c. Emission Limitation:

Combined HAP emissions shall not exceed 9.02 TPY.

Applicable Compliance Method:



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Effective Date: To be entered upon final issuance

Compliance shall be determined through the recordkeeping and monitoring requirements specified in e)(1) and by summing the rolling, 12-month emission rates for each individual HAP to determine total combined HAPs for each rolling, 12-month period.

h) Miscellaneous Requirements

(1) None.



Draft Permit-to-Install and Operate

NEWKOR, INC.

Permit Number: P0108533

Facility ID: 1318005362

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P004, Dipping and Drying Rooms

Operations, Property and/or Equipment Description:

Dipping Room - consisting of two 4,000 gallon in-ground saturation tanks and vented by a 5,000 ACFM ventilation fan

Drying Room - consisting of an 11' 5" H x 25' W x 41' L (11,787.5 ft3) space ventilated to the atmosphere by a 5,000 ACFM explosion proof ceiling fan

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., c)(1) through c)(5), d)(1), e)(2), and f)(1)a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	<p>Volatile organic compound (VOC) emissions shall not exceed 3.6 tons per rolling, 12-month period.</p> <p>See c)(1) through c)(4) below and Section B.</p>

(2) Additional Terms and Conditions

a. None.



c) Operational Restrictions

- (1) The Drying Room shall not contain more than 19 racks of fully saturated cores that were dipped in the resin solution at any one time.
- (2) The phenolic resin impregnation solution shall be comprised of equal volumes of acetone and phenolic resin in a 1:1 ratio.
- (3) The permittee shall not use more than 149,650 pounds of cores per rolling, 12-month period in the resin solution impregnation (dipping) process, based on the pre-dip dry weight of the cores.
- (4) The permittee shall not use more than 8,499.50 gallons of acetone per rolling, 12-month period in the resin solution impregnation (dipping) process.
- (5) The permittee shall not use more than 8,499.50 gallons of phenolic resin per rolling, 12-month period in the resin solution impregnation (dipping) process.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records which identify the following:
 - a. the identification and total number of each different type of core used in the resin solution impregnation process;
 - b. the pre-dip dry weight, in pounds, of each different type of core;
 - c. the total amount, in pounds, of each different type of core determined by multiplying d)(1)a. by d)(1)b. for each type of core;
 - d. the total amount, in pounds, of all cores used in the resin solution impregnation process determined by summing the amount of cores for each core type determined in d)(1)c. for all cores processed;
 - e. the rolling, 12-month summation of the total amount, in pounds, of all cores used in the resin solution impregnation process, based on the pre-dip dry weight.
 - f. the amount, in gallons, of acetone purchased;
 - g. the amount, in gallons, of acetone used in the resin solution impregnation process;
 - h. the rolling, 12-month summation of acetone used in the resin solution impregnation process, in gallons;
 - i. the amount, in gallons, of phenolic resin purchased;
 - j. the amount in, gallons, of phenolic resin used in the resin solution impregnation process; and



- k. the rolling, 12-month summation of the phenolic resin used in the resin solution impregnation process, in gallons.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. exceedance of the 149,650 pounds of cores per rolling, 12-month period limitation for the resin solution impregnation (dipping) process, based on the pre-dip dry weight of the cores;
- ii. exceedance of the 8,499.50 gallons of acetone per rolling, 12-month period limitation for the resin solution impregnation (dipping) process; and
- iii. exceedance of the 8,499.50 gallons of phenolic resin per rolling, 12-month period limitation for the resin solution impregnation (dipping) process.

- b. the probable cause of each deviation (excursion);

- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 3.6 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined through the recordkeeping and monitoring requirements specified in d)(1) above and using the emission factor determined from the mass balance analysis performed on 6/27/2011 as follows:

$$\frac{\text{total pounds of cores}}{\text{rolling, 12 - months}} \times \frac{0.26 \text{ lb solution emitted}}{\text{lb core}} = \frac{\text{lb solution emitted}}{\text{rolling, 12 - months}}$$

$$\frac{\text{lb solution emitted}}{\text{rolling, 12 - months}} \times \frac{\text{lb VOC}}{\text{lb solution}} \times \frac{\text{ton}}{2000 \text{ lbs}} = \frac{\text{tons VOC}}{\text{rolling, 12 - months}}$$

The emissions factor of 0.26 lb solution emitted/lb core processed was determined through mass balance data, and applies only to the dipping and air drying stages of the resin solution impregnation process.

The current resin solution consists of 0.25% formaldehyde, 12.5% methanol, and 5.75% phenol for a total VOC content of 18.5% by weight (0.185 lb VOC/lb resin solution).

(2) In accordance with OAC rule 3745-21-10, U.S. EPA Method 24 shall be used to determine the VOC content of the phenolic resin impregnation solution.

g) Miscellaneous Requirements

(1) Cores with a wall thickness of 0.060 inches are immersed in the phenolic impregnation resin solution for two hours, while cores with wall thicknesses greater than 0.060 inches are immersed for three hours. Fully loaded racks of saturated cores remain on the drying boards for approximately two to three hours to allow excess impregnation material to flow back into the phenolic resin impregnation solution tanks (P004). The average amount of time required for saturation and board drying is five hours. These five hours of dry time in the Dip Room account for approximately 9.4% of the total air dry time (53 hours) required to prepare cores for processing in the ovens (P001 and P003).

All types of phenolic resin saturated cores are air-dried for 48 hours in the Drying Room. This accounts for approximately 90.6% of the total air dry time prior to processing in the ovens (P001 and P003).

(2) Phenolic impregnation resin solution (as applied) data:

a. Georgia Pacific Tybon 5101 Phenolic resin – 9.34 lbs/gallon

b. Acetone – 6.59 lbs/gallon



2. Emissions Unit Group -Two Curing & Baking Ovens: P001,P003,

EU ID	Operations, Property and/or Equipment Description
P001	2.2 MM Btu/Hr Midland Ross Natural Gas Fired Baking Oven
P003	2.2 MM Btu/Hr Midland Ross Natural Gas Fired Baking Oven

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	See Section B.
b.	OAC rule 3745-21-07(M)(4)	Volatile organic compound (VOC) emissions shall not exceed 3 pounds per hour and 15 pounds per day, from each emissions unit. See c)(1) below.

(2) Additional Terms and Conditions

a. None.



c) Operational Restrictions

- (1) The permittee shall not process more than 205 pounds of cores per day in this emissions unit, based on the pre-dip dry weight of each type of core.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records which identify the following for each emissions unit:
 - a. the identification and total number of each different type of core processed per day;
 - b. the pre-dip dry weight, in pounds, of each different type of core;
 - c. the total amount, in pounds, of each different type of core determined by multiplying d)(1)a. by d)(1)b. for each type of core;
 - d. the total amount, in pounds, of cores processed per day determined by summing the amount of each core type determined in d)(1)c. for all cores processed per day;
 - e. the total VOC content, in percent by weight (lb VOC/lb resin solution), of the resin solution, as applied;
 - f. the amount of VOC emissions, in lbs/day, determined in accordance with f)(1)b. below;
 - g. the total processing time, in hours, during which cores are being dried and baked in the oven for each emissions unit; and
 - h. the average hourly emission rate, in lbs VOC/hr, determined by dividing d)(1)f. by d)(1)g..

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. each day on which more than 205 pounds of cores were processed in this emissions unit, based on the pre-dip dry weight of each type of core.



- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 3 pounds per hour for each emissions unit as a daily average.

Applicable Compliance Method:

Compliance shall be determined through the recordkeeping and monitoring requirements specified in d)(1) above.

If required, compliance shall be determined through stack testing performed using U.S. EPA test methods 1-4 and 25 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions shall not exceed 15 pounds per day for each emissions unit.

Applicable Compliance Method:

Compliance shall be determined through the recordkeeping and monitoring requirements specified in d)(1) above and using the emission factor determined from the mass balance analysis performed on 6/27/2011 as follows:

$$\frac{\text{total pounds of cores}}{\text{day}} \times \frac{0.39 \text{ lb solution emitted}}{\text{lb core}} = \frac{\text{lb solution emitted}}{\text{day}}$$



$$\frac{\text{lb solution emitted}}{\text{day}} \times \frac{\text{lb VOC}}{\text{lb solution}} = \frac{\text{lbs VOC}}{\text{day}}$$

The emissions factor of 0.39 lb solution emitted/lb core processed was determined through mass balance data, and applies only to oven drying, and oven baking.

The current resin solution consists of 0.25% formaldehyde, 12.5% methanol, and 5.75% phenol for a total VOC content of 18.5% by weight (0.185 lb VOC/lb resin solution).

- (2) In accordance with OAC rule 3745-21-10, U.S. EPA Method 24 shall be used to determine the VOC content of the phenolic resin impregnation solution, as applied.

g) Miscellaneous Requirements

- (1) None.