

Facility ID: 1652050059 Issuance type: Title V Final Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050059 Issuance type: Title V Final Permit

Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050059 Issuance type: Title V Final Permit

b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:
K002 - emulsion coater #1 - Lembo five-color paper coating line;
Z001 - slitter #1 - slicing machine used to cut finished product;
Z002 - slitter #2 - slicing machine used to cut finished product;
Z003 - slitter #3 - slicing machine used to cut finished product;
Z004 - slitter #4 - slicing machine used to cut finished product;
Z005 - slitter #5 - slicing machine used to cut finished product;
Z006 - slitter #6 - slicing machine used to cut finished product; and
Z007 - slitter #7 - slicing machine used to cut finished product.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

[Go to Part III for Emissions Unit K001](#)

[Go to Part III for Emissions Unit K003](#)

[Go to Part III for Emissions Unit K004](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050059 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
vinyl coating line, including a drying oven, controlled by a catalytic incinerator	OAC rule 3745-21-09(H)(2)	See A.2.a below.
2. Additional Terms and Conditions		
<ol style="list-style-type: none"> a. The permittee shall employ a properly designed, installed, operated, and maintained capture system and associated catalytic incinerator control system in accordance with the manufacturer's recommendations, instructions, and operating manual(s), in order to achieve the following efficiencies for emissions of volatile organic compounds (VOC's), as determined under OAC rule 3745-21-10(C): <ol style="list-style-type: none"> (a) <ol style="list-style-type: none"> i. a capture efficiency which is at least 75%, by weight; and ii. a control efficiency which is at least 90%, by weight. 		

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is operating at or near maximum VOC loading conditions, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is operating at or near maximum VOC loading conditions, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed 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 monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information each day for the control equipment:
 - a. all 3-hour blocks of time when the emissions unit was operating during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance;
 - b. all 3-hour blocks of time when the emissions unit was operating during which the average temperature

difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance; and

c. a log or record of the downtime for the capture (collection) system, control device, and/or temperature monitoring/recording equipment, when the associated emissions unit was in operation.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was operating at or near maximum VOC loading conditions during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was operating at or near maximum VOC loading conditions during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

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

75% minimum capture efficiency of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.2.
 - b. Emission Limitation:

90% minimum control efficiency of VOC emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.2.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal.
 - b. The emissions testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC. The capture and control efficiencies shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined using Methods 1-4 and Method 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.
 - e. The testing shall be conducted while the emissions unit is operating at or near maximum VOC loading conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

4. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
5. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050059 Issuance type: Title V Final Permit

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K001 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. Additional Terms and Conditions		
1. None		

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050059 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K003 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paper coating line, including a drying oven	OAC rule 3745-31-05 (PTI 16-936)	0.0 pound of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents
	40 CFR Part 60, Subpart RR	1.0 tpy of VOC (from cleanup)
	OAC rule 3745-21-09(F)	See A.I.2.a below. See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirements specified in OAC rule 3745-31-05.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

- 1. The permittee shall employ only 100% water-based emulsion adhesive coatings in this emissions unit. Solvent-based adhesives or coatings shall not be employed in this emissions unit.
- 2. The permittee shall not employ any photochemically reactive materials, as defined under OAC rule 3745-21-01(C)(5), for cleanup in this emissions unit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. **Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall collect and record each month the following information for the line:
 - a. the name and identification of each coating and cleanup material, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents) and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each cleanup material, as applied; and
 - d. the total VOC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) x (c) for all cleanup materials employed, divided by 2000 lbs/ton).

Note:

For the purposes of this section, formulation data may be used to determine the VOC content of each coating and cleanup material.

- 2. The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the company identification of each cleanup material employed in this emissions unit; and
- b. whether or not each cleanup material employed is a photochemically reactive material, as defined under OAC rule 3745-21-01(C)(5).

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation reports which identify the days during which photochemically reactive cleanup materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s) and the estimated total quantity of material(s) emitted during each such day, in pounds.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

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:
 - a. Emission Limitation:

0.0 pound of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.1.
 - b. Emission Limitation:

1.0 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.1.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050059 Issuance type: Title V Final Permit

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K003 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or

control measures (if any) may 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>
paper coating line, including a drying oven	none	See B.VI below.
2. Additional Terms and Conditions		
1. None		

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

- 1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be no more than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050059 Issuance type: Title V Final Permit

Part III - Terms and Conditions for Emissions Units

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paper coating line, including a drying oven	OAC rule 3745-31-05	35.9 tpy of organic compounds

(PTI 16-1805)

(OC)

40 CFR Part 60, Subpart RR

1.0 tpy of ethyl acetate (from cleanup)
0.20 kilogram of volatile organic compounds (VOC)
per kilogram of coating solids applied, calculated on a
monthly weighted average basis

OAC rule 3745-21-09(F)

2.9 pounds of VOC per gallon of coating, excluding
water and exempt solvents

2. **Additional Terms and Conditions**

(a) None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. **Operational Restrictions**

1. The permittee shall employ only water-based emulsion adhesive coatings in this emissions unit.
2. The permittee shall not employ any photochemically reactive materials, as defined under OAC rule 3745-21-01(C)(5), for cleanup in this emissions unit.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain monthly records of the following information:
 - a. the total mass, in kilograms, of each coating applied during the calendar month;
 - b. the weight fraction of organics for each coating applied during the calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data;
 - c. the weight fraction of solids for each coating applied during the calendar month as determined from Reference Method 24 or the coating manufacturer's formulation data; and
 - d. the weighted average VOC content for the coatings applied during the calendar month, in kilogram of VOC per kilogram of coating solids applied.
2. The permittee shall collect and record each day the following information for the line:
 - a. the name and identification of each coating, as applied; and
 - b. the VOC content of each coating, excluding water and exempt solvents, in pounds per gallon, as applied.
3. The permittee shall collect and record annually the following information for the purpose of determining annual OC and ethyl acetate emissions:
 - a. the name and identification of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material, in pounds per gallon;
 - c. the ethyl acetate content of each cleanup material, in pounds per gallon;
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the total OC emissions from all coatings and cleanup materials employed, in tons (i.e., the sum of (b) x (d) for all coatings and cleanup materials employed, divided by 2000 lbs/ton); and
 - f. the total ethyl acetate emissions from all cleanup materials employed, in tons (i.e., the sum of (c) x (d) for all cleanup materials employed, divided by 2000 lbs/ton).

Note:

For the purposes of this section, formulation data or USEPA Method 24 shall be used to determine the organic compound content of each coating and cleanup material, and formulation data may be used to determine the toxic air pollutant content (e.g., ethyl acetate) of each solvent employed.

4. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification of each cleanup material employed in this emissions unit; and
 - b. whether or not each cleanup material employed is a photochemically reactive material, as defined under OAC rule 3745-21-01(C)(5).

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation reports to the Director (the appropriate Ohio EPA District Office or local air agency) that identify exceedances of the VOC emission limitation of 0.20 kg/kg of coating solids.

If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) on a semiannual basis.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the VOC content of any coating employed exceeds the VOC content limitation of 2.9 lbs/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit annual reports that specify the total OC emissions and total ethyl acetate emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit deviation reports which identify the days during which photochemically reactive cleanup materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive cleanup material(s) and the estimated total quantity of material(s) emitted during each such day, in pounds.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. **Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

0.20 kilogram of VOC per kilogram of coating solids

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. The VOC content per unit of coating solids applied and compliance with paragraph 60.422(a)(1) of 40 CFR Part 60, Subpart RR shall be determined by either Reference Method 24 and the equations specified in paragraph 60.443 or by the manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and the manufacturers' formulation data, the Method 24 test shall govern. The Director may require the permittee to perform Method 24 tests during such months as he deems appropriate. For Reference Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.
 - b. Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.
 - c. Emission Limitation:

35.9 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.3.
 - d. Emission Limitation:

1.0 tpy of ethyl acetate

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.3.

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. **Miscellaneous Requirements**

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1652050059 Issuance type: Title V Final Permit

[Go to the top of this document](#)

Facility ID: 1652050059 Emissions Unit ID: K004 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paper coating line, including a drying oven	none	See B.VI below.

2. Additional Terms and Conditions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

II. Operational Restrictions

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

III. Monitoring and/or Record Keeping Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

IV. Reporting Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

V. Testing Requirements

- 1. None

[Go to the top of this document](#)

[Go to the top of Part III for this Emissions Unit](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

- 1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be no more than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.