

Facility ID: 1652050059 Issuance type: Title V Draft 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.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. The following emissions units contained in this permit are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ: K001, K002, K003, K004 and K005. The complete NESHAP requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Akron Regional Air Quality Management District (ARAQMD).
2. The following insignificant emissions units are located at this facility:  
  
Z008 (B001) - Emergency Generator; and  
Z009 - Boiler.

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, and as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally - approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

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### b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:  
  
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;  
Z007 - slitter #7 - slicing machine used to cut finished product;  
Z010 - slitter #8 - slicing machine used to cut finished product;  
Z011 - slitter #9 - slicing machine used to cut finished product;  
Z012 - unwind station #1;  
Z013 - slitter #10 - slicing machine used to cut finished product; and  
Z014 - slitter #11 - slicing machine used to cut finished product.

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- [Go to Part III for Emissions Unit K002](#)
- [Go to Part III for Emissions Unit K003](#)
- [Go to Part III for Emissions Unit K004](#)
- [Go to Part III for Emissions Unit K005](#)
- [Go to Part III for Emissions Unit L001](#)

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1652050059 Emissions Unit ID: K001 Issuance type: Title V Draft 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 thermal oxidizer	OAC rule 3745-21-09(H)(2)	The vinyl coating line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds, as determined under paragraph (C) of rule 3745-21-10 of the Administrative Code:  i. a capture efficiency which is at least 75%, by weight; and  ii. a control efficiency which is at least 90%, by weight.
	40 CFR Part 63, Subpart JJJJ	You must limit organic HAP emissions no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources.  [Authority for term: 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ]
	40 CFR Part 64	Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit.
	40 CFR Part 63, Subpart A	The VOC emissions limitations in OAC rule 3745-21-09(H)(2) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with sections 63.3321(b), 63.3350, 63.3400(C), and 63.3410 of 40 CFR Part 63, Subpart JJJJ.  Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. All of the VOC emissions from emissions units K001 and K005 shall be vented to the thermal oxidizer when one or more of these emissions units are in operation.  
[Authority for term: OAC rule 3745-77-07(C)(1)]
2. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3321(a), Table 1 to Subpart JJJJ of Part 63 Operating Limits if Using Add-On Control Devices and Capture System, and 40 CFR 63.3360(e)(3) for establishing the operating limits during the performance test)

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

1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, in any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1) and Table 1 to Subpart JJJJ of 40 CFR Part 63]

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

The permittee shall collect and record the following information for each day for the control equipment:

- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
- b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-21-09(B)(3)(i) and OAC rule 3745-77-07(C)(1)]

3. Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
  - a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred. The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

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### IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
  - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the

associated emissions unit; and

- b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;
- c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;
- d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m) and OAC rule 3745-77-07(C)(1)]

- 2. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit (s) was/were in operation and the VOC emissions were not vented to the thermal oxidizer. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- 3. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

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#### V. Testing Requirements

- 1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.
- c. 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.)
- d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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.
- 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 Akron Regional Air Quality Management District. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District's refusal to accept the results of the emission test(s).

Personnel from the Akron Regional Air Quality Management District 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.

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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.

[Authority for term: OAC rule 3745-21-10(C) and OAC rule 3745-77-07(C)(1)]

- 2. 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:

capture efficiency for VOC emissions which is at least 75%, by weight

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

control efficiency for VOC emissions which is at least 90%, by weight

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

You must limit organic HAP emissions no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated as described in sections 63.3370(e) of 40 CFR Part 63, Subpart JJJJ and section 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1652050059 Emissions Unit ID: K001 Issuance type: Title V Draft 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>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1652050059 Emissions Unit ID: K002 Issuance type: Title V Draft 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>
Emulsion Coater #1 - reverse roll emulsion coating line with attached drying oven.	40 CFR Part 60, Subpart RR	See Section A.2.a below.
	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents
	40 CFR Part 63, Subpart JJJJ	You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.
	40 CFR Part 63, Subpart A	[Authority for term: sections 63.3320(b)(2) & (b)(3) of 40 CFR Part 63, Subpart JJJJ] Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

**2. Additional Terms and Conditions**

- a. Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to section 60.442(a) and all other sections of 40 CFR Part 60, Subpart RR.

(a) [Authority for term: section 60.440(b) of 40 CFR Part 60, Subpart RR]

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**II. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for the line:
  - a. the name and identification number of each coating, as applied; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]
2. The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section 40.446(a) of 40 CFR Part 60, Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.  

[Authority for term: section 60.445(a) of 40 CFR Part 60, Subpart RR]
3. The owner or operator of an affected facility operating at the conditions specified in section 60.440(b) of 40 CFR Part 60, Subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.  

[Authority for term: section 60.445(d) of 40 CFR Part 60, Subpart RR]
4. Records of the measurements required in sections A.III.2 through A.III.3 of these terms and conditions must be retained for at least two years following the date of the measurements.  

[Authority for term: section 60.445(h) of 40 CFR Part 60, Subpart RR]
5. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3360(c) - (d), 40 CFR 63.3370(b)-(d), and 40 CFR 63.3410 (a)).

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**IV. Reporting Requirements**

1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Akron Regional Air Quality Management District within 30 days following the end of the calendar month.  

[Authority for term: OAC rule 3745-21-09(B)(3)(g) and OAC rule 3745-77-07(C)(1)]
2. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

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**V. Testing Requirements**

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

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

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1. 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 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator 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.

[Authority for term: OAC rule 3745-21-10(B) and OAC rule 3745-77-07(C)(1)]
  - b. Emission Limitation:  

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to

the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of sections A.III.2 and A.III.3 of these terms and conditions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitations shall be demonstrated as described in sections 63.3370(b)-(d) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

- 1. None

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**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. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1652050059 Emissions Unit ID: K003 Issuance type: Title V Draft 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>
K003 - Coater with drying oven and laminating station - Emulsion Coater Number 2.	OAC rule 3745-31-05(A)(3) (PTI 16-02375)	65.0 pounds of organic compounds (OC) per hour for coatings  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F), OAC rule 3745-31-05(C), 40 CFR Part 60, subpart RR, and 40 CFR Part 63, subpart JJJJ.
	OAC rule 3745-31-05(C) (to avoid being a major modification under the nonattainment provisions listed in Chapter 3745-31)	The annual OC input rate* and the annual OC emissions each shall not exceed 32.6 tons of OC per rolling, 12-month summation (from coatings and cleanup materials) (see section A.I.2.b below).
	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents
	40 CFR Part 60, Subpart RR	See section A.I.2.c below.
	40 CFR Part 63, Subpart JJJJ	You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

\*Annual coatings and cleanup materials usage is based upon a OC input rate that is equivalent to the annual OC emission rates and is based upon the following:  
OC input rate = (C) x (D) where C = the number of gallons of each coating and cleanup material employed and D = the OC content of each coating and clean up material employed in pounds of OC per gallon of coating and clean up material where 100% of the solvents in the coating and clean up materials employed is emitted.

[Authority for term: sections 63.3320(b)(2) & (b)(3) of 40 CFR Part 63, Subpart JJJJ]

40 CFR Part 63, Subpart A

Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

## 2. Additional Terms and Conditions

- a. The hourly allowable OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with this limitation.

(a)

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- b. Both the annual combined coating and cleanup material usage OC input rate\* and the annual emissions of OC from this emissions unit shall not exceed 32.6 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates and OC emissions, respectively. The permittee has existing coating and cleanup material usage OC input\* records and therefore does not need to be limited to first year monthly coating and cleanup material usage OC input\* amounts.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- c. Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to section 60.442(a) and all other sections of 40 CFR Part 60, Subpart RR.

[Authority for term: section 60.440(b) of 40 CFR Part 60, Subpart RR]

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### II. Operational Restrictions

1. None

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

1. The permittee shall collect and record the following information each month for the line:
- the name and identification number of each coating, as applied;
  - the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, as applied;
  - the OC content of each coating, in pounds per gallon or weight fraction, as applied;
  - the number of gallons or pounds of each coating employed;
  - the name and identification of each cleanup material employed;
  - the OC content of each cleanup material, in pounds per gallon or weight fraction;
  - the number of gallons or pounds of each cleanup material employed;
  - the total OC input amounts\* and the total OC emissions, in tons, from all the coatings and cleanup materials employed; and
  - the rolling, 12-month OC input rate\* and the total OC emissions, in tons, from all the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section 40.446(a) of 40 CFR Part 60, Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: section 60.445(a) of 40 CFR Part 60, Subpart RR]

3. The owner or operator of an affected facility operating at the conditions specified in section 60.440(b) of 40 CFR Part 60, Subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

[Authority for term: section 60.445(d) of 40 CFR Part 60, Subpart RR]

4. Records of the measurements required in sections A.III.2 through A.III.3 of these terms and conditions must be retained for at least two years following the date of the measurements.

[Authority for term: section 60.445(h) of 40 CFR Part 60, Subpart RR]

5. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3360(c) - (d), 40 CFR 63.3370(b)-(d), and 40 CFR 63.3410 (a)).

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#### IV. Reporting Requirements

1. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) from this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07 (C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of both the rolling, 12-month OC emission limitation of 32.6 tons (from coatings and cleanup materials usages) and the rolling, 12-month OC input rate of 32.6 tons (from coatings and cleanup materials usages).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

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#### 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:

65.0 pounds of OC per hour for coatings

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum pounds of coatings applied per hour by the maximum OC weight fraction of all the coatings.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitation:

The annual OC input rate\* and the annual OC emissions each shall not exceed 32.6 tons of OC per rolling, 12-month summation (from coatings and cleanup materials)

Applicable Compliance Method:

Compliance with the limitations above shall be demonstrated in accordance with the monthly record keeping requirements specified in section A.III.1 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- c. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of these

terms and conditions. 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, an owner or operator 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.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of sections A.III.2 and A.III.3 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitations shall be demonstrated as described in sections 63.3370(b)-(d) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1652050059 Emissions Unit ID: K003 Issuance type: Title V Draft 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>
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2. Additional Terms and Conditions

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 1652050059 Emissions Unit ID: K004 Issuance type: Title V Draft 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>
Emulsion Coater #3 - application of reverse roll coating with water-based pressure sensitive adhesive and laminate to various types of polycoated liners, polyesters, vinyls, polystyrenes, super calendared papers, papers and paper foils, dried with a natural gas-fired oven, air emissions of organic compounds (OCs) uncontrolled and vented to a roof stack	OAC rule 3745-31-05(A)(3) (PTI 16-02229)  40 CFR Part 60, Subpart RR OAC rule 3745-21-09(F)  40 CFR Part 63, Subpart JJJJ	0.899 pound of organic compounds (OC) per gallon of coating, as applied after final formulation, excluding water and exempt solvents  40.01 tons per year of OC from coatings and cleanup materials  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, subpart RR. See Section A.2.a below. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

40 CFR Part 63, Subpart A

[Authority for term: sections 63.3320(b)(2) &amp; (b)(3) of 40 CFR Part 63, Subpart JJJJ]

Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

**2. Additional Terms and Conditions**

- a. Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to section 60.442(a) and all other sections of 40 CFR Part 60, Subpart RR.

(a)

[Authority for term: section 60.440(b) of 40 CFR Part 60, Subpart RR]

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in the drying oven for this emissions unit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

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

1. The permittee shall collect and record each month the following information for the coating line:

- a. the name and identification of each coating employed; and
- b. the OC content of each coating employed, in pound(s) per gallon, as applied after final formulation, excluding water and exempt solvents.

[Note: For the purposes of this section, formulation data may be used to determine the OC content of each coating employed.]

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section 40.446(a) of 40 CFR Part 60, Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: section 60.445(a) of 40 CFR Part 60, Subpart RR]

3. The owner or operator of an affected facility operating at the conditions specified in section 60.440(b) of 40 CFR Part 60, Subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

[Authority for term: section 60.445(d) of 40 CFR Part 60, Subpart RR]

4. Records of the measurements required in sections A.III.2 through A.III.3 of these terms and conditions must be retained for at least two years following the date of the measurements.

[Authority for term: section 60.445(h) of 40 CFR Part 60, Subpart RR]

5. The permittee shall collect and record each month the following information for the purpose of determining annual OC emissions:

- a. the name and identification of each coating and cleanup material employed;
- b. the OC content of each coating and cleanup material, in pound(s) per gallon or weight fraction;
- c. the number of gallons or pounds of each coating and cleanup material employed; and
- d. the total OC emissions from all coatings and cleanup materials employed, in tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

6. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3360(c) - (d), 40 CFR 63.3370(b)-(d), and 40 CFR 63.3410 (a)).

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**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. 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.  
  
[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]
2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.  
  
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
3. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

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V. **Testing Requirements**

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

0.899 pound of OC per gallon of coating, as applied after final formulation, excluding water and exempt solvents

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
  - b. Emission Limitation:
 

40.01 tons per year of OC from coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.5 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
  - c. Emission Limitation:
 

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of sections A.III.2 and A.III.3 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
  - d. Emission Limitations:
 

You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitations shall be demonstrated as described in sections 63.3370(b)-(d) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1652050059 Emissions Unit ID: K004 Issuance type: Title V Draft 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>
Emulsion Coater #3 - application of reverse roll coating with water-based pressure sensitive adhesive and laminate to various types of polycoated liners, polyesters, vinyls, polystyrenes, super calendared papers, papers and paper foils, dried with a natural gas-fired oven, air emissions of organic compounds (OCs) uncontrolled and vented to a roof stack	none	See Part III, B.III.1 through 3 below.

#### 2. Additional Terms and Conditions

1. None

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#### II. Operational Restrictions

1. None

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

1. The permit to install for this emissions unit was evaluated based on the actual coatings and cleanup materials employed, 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl acetate (CAS 141-78-6)  
 TLV (ug/m3): 1,440,000  
 Maximum Hourly Emission Rate (lbs/hr): 22.5  
 Predicted 1-Hour Maximum Ground-Level Concentration at 139 m (ug/m3): 2106  
 MAGLC (ug/m3): 34,286

2. 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 Toxics 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 Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

a. changes in the composition of the materials used (process materials and 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 Toxics 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.

- 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 1652050059 Issuance type: Title V Draft Permit**

**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 1652050059 Emissions Unit ID: K005 Issuance type: Title V Draft 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>
Solvent Coater - pressure sensitive tape & label adhesives applied to continuous web paper and film substrates, dried with rated 9.0 MM Btu/hr, natural gas-fired direct heat transfer oven, air emissions of volatile organic compounds (VOC) and organic hazardous air pollutants (HAPs) captured, vented to and destroyed by a natural gas-fired thermal oxidizer employing a 96% overall capture and control system	OAC rule 3745-31-05(A)(3) (PTI 16-02263)	51.4 lbs/hr & 112.57 tons per year (tpy) of volatile organic compounds (VOC) emissions (thermal oxidizer stack emissions);  96% overall VOC emission reduction, by weight;  Note: All VOC emissions are considered to be organic HAP emissions.

(Modified).	0.1 lb/hr & 0.4 tpy of particulate emissions (PE) (thermal oxidizer stack emissions);
	13.2 lbs/hr & 57.8 tpy of nitrogen oxides (NOx) emissions (thermal oxidizer stack emissions);
	8.26 lbs/hr & 36.2 tpy of carbon monoxide (CO) emissions (thermal oxidizer stack emissions); and
40 CFR Part 63, Subpart JJJJ	The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart JJJJ. You must limit organic HAP emissions no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources.
OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(F)	[Authority for term: 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ] The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR Part 60 Subpart RR	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR Part 64	Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit.
40 CFR Part 63, Subpart A	The VOC emissions limitations in OAC rule 3745-31-05(A)(3) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with sections 63.3321(b), 63.3350, 63.3400(C), and 63.3410 of 40 CFR Part 63, Subpart JJJJ. Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

**2. Additional Terms and Conditions**

- a. The hourly VOC, PM, NOx, and CO emission limitations were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these limitations.
- (a) However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increase(s) the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).
- b. The permittee shall properly install, adjust, operate, and maintain, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), a thermal oxidizer and associated control equipment as necessary to adequately capture, contain, vent, and destroy air emissions of VOCs and HAPs from this emissions unit as required by this permit and to the extent possible with good engineering design and practice.

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**II. Operational Restrictions**

- 1. The thermal oxidizer with all associated control equipment serving this emissions unit shall be in operation at all times the emissions unit is in operation and coating raw materials. If the thermal oxidizer or any of its associated control equipment malfunctions or must be shut down for any reason, the emissions unit shall immediately cease coating until effective repairs are made. Once coating has ceased, the line may continue operating until the coated material is through the oven. Normal operation does not include oven startup before coating begins.  
  
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- 2. The emissions unit, vented to the thermal oxidizer as required in normal operation, shall only vent directly to ambient air (e.g., through a bypass stack) during emergency conditions as detected by Lower Explosive Level (LEL) instrumentation and the direct venting to ambient air shall only occur until the emissions unit safely ceases coating raw material. The emissions unit shall remain shut down until the reason for the LEL emergency condition has been effectively identified and corrected and the emissions unit can resume normal operations, venting to the thermal oxidizer.  
  
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]
- 3. The permittee shall store all waste materials in closed containers with tightly fitted covers.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

4. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3321(a), Table 1 to Subpart JJJJ of Part 63 Operating Limits if Using Add-On Control Devices and Capture System, and 40 CFR 63.3360(e)(3) for establishing the operating limits during the performance test)

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

1. The permittee shall document all times the thermal oxidizer and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, in any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1) and Table 1 to Subpart JJJJ of 40 CFR Part 63]

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

The permittee shall collect and record the following information for each day for the control equipment:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]

4. Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented;
- and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. The permittee shall collect and record each month the following information for the purpose of determining annual VOC emissions:

- a. the name and identification number of each coating, as applied;

- b. the VOC content of each coating, as applied, in pounds per gallon;
    - c. the number of gallons of each coating employed;
    - d. the name and identification of each cleanup material employed;
    - e. the VOC content of each cleanup material, in pounds per gallon;
    - f. the number of gallons of each cleanup material employed;
    - g. the total uncontrolled VOC emissions from all the coatings and cleanup materials employed [summation of (b x c) for all coatings+ summation of (e x f) for all cleanup materials], in pounds or tons; and
    - h. the calculated, controlled VOC emission rate for all the coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
- [Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
6. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:
  - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
  - b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;
  - c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;
  - d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]
2. The permittee shall submit deviation (excursion) reports that identify any time periods when the thermal oxidizer and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation. Each report shall be submitted within 30 days after the deviation occurs.
 

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.
 

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
4. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

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#### V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the 96% overall VOC emission reduction requirement.
 

[Note: Compliance with the 95% overall HAP emission reduction requirement is assumed if the permittee demonstrates compliance with the 96% overall VOC emission reduction requirement.]
  - c. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron Regional Air Quality Management District.
  - d. The following test methods shall be employed to demonstrate compliance with the capture efficiency and

control efficiency limitations for VOC:

- i. The capture efficiency shall be determined using Methods 204 through Method 204F, as specified 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 "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request for the use of an alternative method, including an evaluation of the applicability, necessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)
- ii. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10(C). 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.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Administrator.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District's refusal to accept the results of the emission test(s).

f. Personnel from the Akron Regional Air Quality Management District 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.

g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron Regional Air Quality Management District 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 from the Akron Regional Air Quality Management District.

[Authority for term: OAC rule 3745-21-10(C) and OAC rule 3745-77-07(C)(1)]

2. 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 Limitations:

0.1 lb/hr & 0.4 tpy of PE (thermal oxidizer stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- b. Emission Limitations:

51.4 lbs/hr & 112.57 tpy of VOC emissions (thermal oxidizer stack emissions)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- c. Emission Limitation:

96% overall VOC emission reduction, by weight

Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC emission reduction requirement of 96%, by weight, based on the results of emission testing conducted in accordance with the methods as outlined in Section A.V.1 of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

- d. Emission Limitations:

13.2 lbs/hr & 57.8 tpy of NOx emissions (thermal oxidizer stack emissions).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation based on the results of emission testing conducted in accordance with Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

8.26 lbs/hr & 36.2 tpy of CO emissions (thermal oxidizer stack emissions).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation based on the results of emission testing conducted in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

You must limit organic HAP emissions no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated as described in sections 63.3370(e) of 40 CFR Part 63, Subpart JJJJ and section 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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VI. **Miscellaneous Requirements**

- 1. None

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**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>
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- 2. **Additional Terms and Conditions**

- 1. None

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**II. Operational Restrictions**

- 1. None

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

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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Facility ID: 1652050059 Emissions Unit ID: L001 Issuance type: Title V Draft 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>
Die Cleaning Station - cold solvent cleaning of metal coating die, air emissions of volatile organic compounds (VOC) and organic hazardous air pollutants (HAPs) captured and vented to a roof stack.	OAC rule 3745-31-05(A)(3) (PTI 16-02263)  OAC rule 3745-21-09(O)	4 ton per year of volatile organic compounds (VOC) emissions.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O). See A.I.2.a through A.I.2.d below.

**2. Additional Terms and Conditions**

- a. The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.

(a) [Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07

(A)(1)]

- b. The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

- c. The cold cleaner shall be maintained with a freeboard ratio equal to or greater than 0.7.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

- d. The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

i. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.

ii. Store waste solvent in covered containers.

iii. Close the cover whenever parts are not being handled in the cleaner.

iv. Drain the cleaned parts until dripping ceases.

v. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.

vi. Clean only materials that are neither porous nor absorbent.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

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**II. Operational Restrictions**

1. None

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

1. The permittee shall maintain records for at least five years of the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit, and make these records available to the Director upon verbal or written request.

[Authority for term: OAC rule 3745-21-09(O)(5), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain records of the following information, collected at the end of each year:

a. the total cleaning solvent added to the cold cleaner or the amount purchased for use in the emissions unit during the year;

b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and

c. the estimated annual VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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**IV. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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**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:
    - 4 ton per year of VOC emissions
    - Applicable Compliance Method:
      - Compliance with the emission limitations shall be based on the record keeping requirements in section A.III.2 of these terms and conditions.

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**VI. Miscellaneous Requirements**

1. None

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**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. <b>Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

1. None

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

1. None

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**IV. Reporting Requirements**

1. None

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**V. Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None