

Facility ID: 1667040015 Issuance type: Title V Preliminary Proposed Permit

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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. Schneller, Inc. has requested to restrict the emissions of volatile organic compounds (VOC) to 245.0 tons per rolling, 12-month period. The company proposed this emission limitation to avoid being classified as a major source for Prevention of Significant Deterioration (PSD). Schneller, Inc. has accepted this emission limitation as a facility-wide cap on VOC emissions from the following emissions units: K001, K003, K004, K005, K006, K007, and P002.

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

2. To ensure enforceability during the first 12 calendar months of operation following the effective date of this permit, the permittee shall not exceed the emission levels specified in the following table:

. Maximum Allowable
Month(s) Cumulative Emissions of VOC

1 20.4 tons
1-2 40.8 tons
1-3 61.3 tons
1-4 81.7 tons
1-5 102.1 tons
1-6 122.5 tons
1-7 142.9 tons
1-8 163.3 tons
1-9 183.8 tons
1-10 204.2 tons
1-11 224.6 tons
1-12 245.0 tons

After the first 12 calendar months of operation following the effective date of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

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

3. In order to determine compliance with the facility-wide emission limitation, the permittee shall maintain monthly records of the following information for emissions units: K001, K003, K004, K005, K006, K007, and P002.

a. For emissions unit K001:

- i. the calculated, controlled VOC emission rate from all coatings, in tons per month as determined in Part III - Terms and Conditions for Emissions Units, section A.III.2.e for this emissions unit;
- ii. the name and identification of each cleanup material employed;
- iii. the VOC content of each cleanup material employed, as applied;
- iv. the number of gallons of each cleanup material employed;
- v. the VOC emission rate from all cleanup materials employed, in tons per month (i.e., the sum of (iii) times (iv) for each cleanup material, then divided by 2000 lbs/ton);
- vi. the total VOC emission rate from all coatings and cleanup materials employed, in tons per month (i.e., the addition of (i) plus (v)).

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

- b. For emissions unit K003, the total calculated VOC emission rate from all coatings and cleanup materials, in tons per month (i.e., the summation of the daily values as determined in Part III - Terms and Conditions for Emissions Unit, section A.III.2.g for this emissions unit, then divided by 2000 lbs/ton).

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

- c. For emissions unit K004, the total calculated VOC emissions from all coatings and cleanup materials, in tons per month (i.e., the summation of the daily values as determined in Part III - Terms and Conditions for Emissions Unit, section A.III.1.i for this emissions unit, then divided by 2000 lbs/ton).

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

- d. For emissions unit K005, the total calculated VOC emissions from all coatings and cleanup materials, in tons per month (i.e., the summation of the daily values as determined in Part III - Terms and Conditions for Emissions Unit, section A.III.1.i for this emissions unit, then divided by 2000 lbs/ton).

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

- e. For emissions unit K006:

- i. the name and identification number of each coating and cleanup material, as applied;
- ii. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
- iii. the number of gallons of each coating and cleanup material employed; and
- iv. the total VOC emissions from all coatings and cleanup materials, in tons per month (i.e., the sum of (ii) times (iii) for each coating plus the sum of (ii) times (iii) for each cleanup material, then divided by 2000 lbs/ton).

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

- f. For emissions unit K007, the total calculated VOC emissions from all coatings and cleanup materials, in tons per month (i.e., as determined in Part III - Terms and Conditions for Emissions Unit, section A.III.1.i for this emissions unit).

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

- g. For emissions unit P002:

- i. the amount of material mixed, in pounds per month;
- ii. the VOC emission rate from the mixing operation, excluding cleanup material, in tons per month (i.e., multiply the emissions factor of 0.00356* pound of VOC per pound of material mixed by (i), then divided by 2000 lbs/ton);
- iii. the name and identification of each cleanup material employed;
- iv. the VOC content of each cleanup material, in pounds of VOC per gallon, as applied;
- v. the number of gallons of each cleanup material employed;
- vi. the VOC emission rate for all cleanup materials employed, in tons per month (i.e., the sum of (iv) times (v) for each cleanup material, then divided by 2000 lbs/ton);
- vii. the total VOC emission rate from the mixing operation and all cleanup materials employed, in tons per month (i.e., the addition of (ii) plus (vi)).

*The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.

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

- h. For facility-wide emissions:

- i. the total VOC emissions for the entire facility, in tons per month (i.e., section A.3.a.vi plus section A.3.b plus section A.3.c plus section A.3.d plus section A.3.e.iv plus section A.3.f plus section A.3.g.vii);
- ii. during the first 12 calendar months of operation following the effective date of this permit, the permittee shall record the cumulative emissions of VOC for the entire facility for each calendar month; and
- iii. beginning after the first 12 calendar months of operation following the effective date of this permit, the permittee shall record the rolling, 12-month summation of the monthly emissions of VOC for the entire facility for each calendar month.

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

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of the operation following the effective date of this permit, all exceedances of the maximum allowable cumulative emissions level. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Terms and Condition (A)(1)(c).

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

5. The permittee shall also submit annual reports that specify the total VOC emissions from the facility for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.

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

6. Compliance with the emission limitation(s) in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitation:

245.0 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements in sections A.3, A.3.a, A.3.b, A.3.c, A.3.d, A.3.e, A.3.f, A.3.g, and A.3.h of this permit. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexograph and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

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

7. The following insignificant emissions units are located at this facility:

B001 - press boiler (Permit to Install 16-1026);
B002 - laminator boiler (Permit to Install 16-1026);
T004 - MEK tank (Permit to Install 16-1299); and
T005 - xylene tank (Permit to Install 16-1299).

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:

Z005 - rotary tank #1; and
Z006 - rotary tank #2.

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- [Go to Part III for Emissions Unit K003](#)
- [Go to Part III for Emissions Unit K004](#)
- [Go to Part III for Emissions Unit K005](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1667040015 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed 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>
reverse roll coater and rotogravure printing - 80 line coater, controlled with a thermal incinerator	OAC rule 3745-31-05(C) (PTI 16-01949)	20.3 lbs/hr volatile organic compounds (VOC) for coatings
		60.9 tpy of VOC as a rolling, 12-month summation for coatings
		3.24 tpy of VOC as a rolling, 12-month summation for cleanup materials
		The thermal incinerator shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, and a capture efficiency which is at least 98.2 percent, by weight, for VOC.
		See sections A.II.2 and A.II.3 below.
	OAC rule 3745-21-09(B)(6)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	OAC rule 3745-21-09(H)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(C).
	40 CFR Part 60, Subpart FFF	On and after the date on which the performance test required by section 60.8 of 40 CFR Part 60 has been completed, the permittee shall reduce the VOC emissions to the atmosphere by 85 percent from each affected facility.
	40 CFR Part 63, Subpart KK	This emissions unit shall demonstrate compliance with 40 CFR Part 63, Subpart KK by meeting the requirements of 40 CFR Part 63.821(a)(2)(ii) as outlined in sections A.I.2.a and A.III.6 below.
	40 CFR Part 63, Subpart JJJJ	HAP emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction).
		[Authority for term: section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ]
		Should Subpart JJJJ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

The permittee shall comply with the applicable requirements of this rule by December 5, 2005 unless the deadline is changed by USEPA.

[Authority for term: section 63.3330(a) of 40 CFR Part 63, Subpart JJJJ].

40 CFR Part 63, Subpart A

The applicable requirements for this rule are specified in Table 1 of 40 CFR Part 63, Subpart KK and in Table 2 of 40 CFR Part 63, Subpart JJJJ which are included in the text of Attachments 1 and 2 hereto, and are hereby incorporated into this permit as if fully written.

40 CFR Part 64

See sections A.II.1 and A.II.5, A.III.11 through A.III.15, and A.IV.16 through A.IV.19 below.

2. Additional Terms and Conditions

- a. The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations in each month shall never exceed 5 percent, by weight, of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations.

(a)

[Authority for term: section 63.821(a)(2)(ii)(A) of 40 CFR Part 63, Subpart KK]

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II. Operational Restrictions

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit or 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.

[Authority for term: OAC rule 3745-31-05(C) and OAC rule 3745-77-07(A)(1) and section 64.6(c)(2) of 40 CFR Part 64]

- 2. The maximum annual operating hours* for this emissions unit shall not exceed 6000 hours, based upon a rolling, 12-month summation of the operating hours.

* Annual operating hours does not include cleanup time.

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

- 3. The maximum annual cleanup material usage for this emissions unit shall not exceed 3.24 tons, based upon a rolling, 12-month summation of the cleanup material usage figures.

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

- 4. For any web coating line or group of web coating lines for which you use add-on control devices, unless you use a solvent recovery system and conduct a liquid-liquid material balance, you must meet the following operating limits specified in Table 1 of 40 CFR Part 63, Subpart JJJJ (see Attachment 2). These operating limits apply to emission capture systems and control devices, and you must establish the operating limits during the performance test according to the requirements in section A.V.8.c of this permit. You must meet the operating limits at all times after you establish them.

[Authority for term: section 63.3321(a) and Table 1 of 40 CFR Part 63, Subpart JJJJ]

- 5. For each 3-hour period of operation, the differential pressure across the enclosure shall be greater than 0.007 inch of water column.

[Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each day for the coating line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds per gallon, as applied;
 - c. the number of gallons of each coating employed;
 - d. the total uncontrolled VOC emissions from all coatings, in pounds per day;
 - e. the calculated, controlled VOC emission rate for all coatings, in pounds per day (the controlled 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);

- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emissions rate for all coatings in pound(s) per hour (i.e., (e)/(f)).
- [Authority for term: OAC rule 3745-31-05(C) and OAC rule 3745-77-07(C)(1)]
2. The permittee shall maintain monthly records of the following information:
- a. the cleanup material usage for each month, in tons;
- b. the rolling, 12-month summation of the cleanup material usage figures;
- c. the operating hours for each month;
- d. the rolling, 12-month summation of the operating hours;
- e. the calculated, controlled VOC emission rate from all coatings, in tons per month (the sum of the daily values from section A.III.1.e of these terms and conditions, then divided by 2000 lbs/ton); and
- f. the rolling, 12-month summation of the emissions of VOC for coatings.
- [Authority for term: OAC rule 3745-31-05(C) and OAC rule 3745-77-07(C)(1)]
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information for each day:
- a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less 1350 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
- b. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- [Authority for term: OAC rule 3745-21-09(B)(3)(I) and OAC rule 3745-77-07(C)(1)]
4. The permittee of an affected facility controlled by a thermal incineration emission control device shall install, calibrate, operate, and maintain a monitoring device that continuously measures and records the temperature of the control device exhaust gases and shall comply with the following requirements:
- a. The continuous monitoring device shall be calibrated annually and have an accuracy of plus or minus 0.75 percent of the temperature being measured, expressed in degrees Celsius, or plus or minus 2.5 degrees Celsius, whichever is greater.
- b. During the performance test, the permittee shall determine and record the average temperature of the control device exhaust gases. After the performance test, the permittee shall determine and record, in addition to the record made by the continuous monitoring device, the average temperature for each 3-hour clock period of printing operation when the average temperature of the exhaust gases is more than 28 degrees Celsius (50 degrees Fahrenheit) below the average temperature demonstrated during the most recent performance test.
- [Authority for term: section 60.584(b) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05]
5. The permittee of an affected facility shall record time periods of operation when an emission control device is not in use.
- [Authority for term: section 60.584(d) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05]
6. In order to determine compliance with section A.I.2.a above, the permittee shall maintain the following records for 5 years and submit them to the Administrator (the Akron RAQMD) upon request:
- a. the total mass of each material applied each month on the press, including all inboard and outboard stations;
- b. the total mass of each material applied each month on the press by the product and packaging rotogravure printing operations; and
- c. the weight percent of materials applied on the press by the product and packaging rotogravure printing operations (i.e., (b)/(a) times 100).
- [Authority for term: section 63.829(f) of 40 CFR Part 63, Subpart KK and OAC rule 3745-31-05]
7. Following the date on which the initial performance test of a control device is completed to demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device used to comply with section 63.3320 of 40 CFR Part 63, Subpart JJJJ. You must install and operate the monitoring equipment as specified in section A.III.9 of this permit.
- [Authority for term: section 63.3350(b) of 40 CFR Part 63, Subpart JJJJ]

8. If you are using a control device to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in section A.III.8.i below and section A.III.9 of this permit according to the requirements in sections A.III.8.a through A.III.8.h below.
- a. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.
 - b. You must have valid data from at least 90 percent of the hours during which the process operated.
 - c. You must determine the hourly average of all recorded readings according to sections A.III.8.c.i and A.III.8.c.ii below.
 - i. To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.
 - ii. Provided all of the readings recorded in accordance with section A.III.8.c clearly demonstrate continuous compliance with the standard that applies to you, then you are not required to determine the hourly average of all recorded readings.
 - d. You must determine the rolling, 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, you must have at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).
 - e. You must record the results of each inspection, calibration, and validation check of the CPMS.
 - f. At all times, you must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), you must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in section A.V.10.g of this permit. You must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
 - h. Any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation, and you must notify the Administrator (the Akron RAQMD) in accordance with section A.IV.11 of this permit.
 - i. If you are using an oxidizer to comply with the emission standards, you must comply with sections A.III.8.i.i through A.III.8.i.ii below.
 - i. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.
 - ii. For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of plus or minus 1 percent of the temperature being monitored in degrees Celsius, or plus or minus 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.
- [Authority for term: section 63.3350(e) of 40 CFR Part 63, Subpart JJJJ]
9. If you are complying with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ through the use of a capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the information specified in sections A.III.9.a and A.III.9.b below for these capture systems. You must monitor the capture system in accordance with section A.III.9.c below. You must make the monitoring plan available for inspection by the permitting authority upon request.
- a. The monitoring plan must:
 - i. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and
 - ii. Explain why this parameter is appropriate for demonstrating ongoing compliance; and
 - iii. Identify the specific monitoring procedures.
 - b. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.
 - c. You must conduct all capture system monitoring in accordance with the plan.
 - d. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.
 - e. You must review and update the capture system monitoring plan at least annually.

[Authority for term: section 63.3350(f) of 40 CFR Part 63, Subpart JJJJ]

10. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must maintain the records specified in sections A.III.10.a and A.III.10.b below on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1) (see Attachment 2):
- a. Records specified in 40 CFR 63.10(b)(2) (see Attachment 2) of all measurements needed to demonstrate compliance with this standard, including:
 - i. Control device and capture system operating parameter data in accordance with the requirements of sections A.III.8 and A.III.9 of this permit; and
 - ii. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of sections A.V.8 and A.V.9 of this permit.
 - b. Records specified in 40 CFR 63.10(c) (see Attachment 2) for each CMS operated by the owner or operator in accordance with the requirements of section A.III.7 of this permit.

[Authority for term: section 63.3410(a) of 40 CFR Part 63, Subpart JJJJ]

11. Operation of approved monitoring.
- a. Commencement of operation. The owner or operator shall conduct the monitoring required under 40 CFR Part 64 upon issuance of a Part 70 or 71 permit that includes such monitoring.
 - b. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - c. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
 - d. Response to excursions or exceedances.
 - i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
 - e. Documentation of need for improved monitoring. After approval of monitoring under 40 CFR Part 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: section 64.7 of 40 CFR Part 64]

12. Quality improvement plan (QIP) requirements.
- a. Based on the results of a determination made under section A.III.11.d.ii of this permit, the Administrator or the permitting authority (the Akron RAQMD) may require the owner or operator to develop and implement a QIP. Consistent with section 64.6(c)(3) of 40 CFR Part 64, the Part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.
 - b. Elements of a QIP:
 - i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.
 - ii. The plan initially shall include procedures for evaluating the control performance problems and, based on

the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

- (a) Improved preventive maintenance practices.
- (b) Process operation changes.
- (c) Appropriate improvements to control methods.
- (d) Other steps appropriate to correct control performance.
- (e) More frequent or improved monitoring (only in conjunction with one or more steps under sections A.III.12.b.ii.(a) through (d) above.

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to section A.III.11.d.ii of this permit the Administrator or the permitting authority (the Akron RAQMD) may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

- i. Failed to address the cause of the control device performance problems; or
- ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[Authority for term: section 64.8 of 40 CFR Part 64]

13. General record keeping requirements.

a. The owner or operator shall comply with the record keeping requirements specified in section 70.6(a)(3) (ii) of 40 CFR Part 70. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to section A.III.12 of this permit and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

[Authority for term: section 64.9(b) of 40 CFR Part 64]

14. The permittee shall operate and maintain a continuous data acquisition system to monitor the thermal incinerator combustion temperature. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test.

If there is any excursion of the average thermal incinerator combustion temperature during the quarter, the permittee shall develop a QIP as required in section A.III.12 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

15. The permittee shall operate and maintain a continuous data acquisition system to monitor the differential pressure across the enclosure. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column.

If there is any excursion of the average differential pressure across the enclosure during the quarter, the permittee shall develop a QIP as required in section A.III.12 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month cleanup material usage limitation. These reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-31-05(C) and OAC rule 3745-77-07(C)(1)]
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month operating hours limitation. These reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-31-05(C) and OAC rule 3745-77-07(C)(1)]
3. 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 incinerator, when the emissions unit was in operation, does not comply with the temperature limitation specified above.

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) and OAC rule 3745-31-05]
4. The permittee shall submit on a semiannual basis deviation (excursion) reports that include an identification of each month during which the weight-percent of materials applied on the press by the product and packaging rotogravure printing operations exceeded 5 percent, and the actual weight-percent of each such month. These reports shall be submitted by January 31 and July 31 of each year to the Administrator (the Akron RAQMD).

[Authority for term: section 63.860(b)(6) of 40 CFR Part 63, Subpart KK and OAC rule 3745-31-05]
5. The performance test data and results from the performance test to show compliance with 85 percent reduction in VOC emissions to the atmosphere from the affected source shall be submitted to the Administrator (the Akron RAQMD) as specified in 40 CFR 60.8(a).

[Authority for term: section 60.585(a) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05]
6. The permittee of each affected facility shall submit semiannual reports to the Administrator (the Akron RAQMD) of drops in the incinerator temperature as defined under section A.III.4.b of these terms and conditions. These reports shall be postmarked within 30 days following the end of the second and fourth calendar quarters.

[Authority for term: sections 60.585(b)(3), 60.585(c) of 40 CFR Part 60, Subpart FFF, and OAC rule 3745-31-05]
7. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions exceeded 20.3 lbs/hr, and the actual average hourly VOC emissions for each such day. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

[Authority for term: OAC rule 3745-31-05(C) and OAC rule 77-07(C)(1)]
8. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC for coatings. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

[Authority for term: OAC rule 3745-31-05(C) and OAC rule 77-07(C)(1)]
9. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must submit the reports specified in sections A.IV.10 through A.IV.15 of this permit to the Administrator (the Akron RAQMD).

[Authority for term: section 63.3400(a) of 40 CFR Part 63, Subpart JJJJ]
10. You must submit an initial notification as required by 40 CFR 63.9(b) (see Attachment 2).
 - a. Initial notification for existing affected sources must be submitted no later than 1 year before December 5, 2005.
 - b. Initial notification for new and reconstructed affected sources must be submitted as required by 40 CFR 63.9(b) (see Attachment 2).
 - c. For the purpose of 40 CFR Part 63, Subpart JJJJ, a Title V or Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b) (see Attachment 2), provided the same information is contained in the permit application as required by 40 CFR 63.9(b) (see Attachment 2) and the State to which the permit application has been submitted has an approved operating permit program under Part 70 of this chapter and has received delegation of authority from the EPA to implement and enforce 40 CFR Part 63, Subpart JJJJ.

- d. If you are using a permit application in lieu of an initial notification in accordance with section A.IV.10.c above, the permit application must be submitted by the same due date specified for the initial notification.

[Authority for term: section 63.3400(b) of 40 CFR Part 63, Subpart JJJJ]

11. You must submit a semiannual compliance report according to sections A.IV.11.a and A.IV.11.b below.
- a. Compliance report dates.
- i. The first compliance report must cover the period beginning on December 5, 2005 and ending on December 31.
- ii. The first compliance report must be postmarked or delivered no later than January 31.
- iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
- iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- v. For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to section 70.6(a)(3)(iii)(A) of 40 CFR Part 70 or section 71.6(a)(3)(iii)(A) of 40 CFR Part 71, you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in sections A.IV.11.a.i through A.IV.11.a.iv above.
- b. The compliance report must contain the information in sections A.IV.11.b.i through A.IV.11.b.v below:
- i. Company name and address.
- ii. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
- iii. Date of report and beginning and ending dates of the reporting period.
- iv. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- v. For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in 40 CFR Part 63, Subpart JJJJ, the compliance report must contain the information in sections A.IV.11.b.i through A.IV.11.b.iii above, and:
- (a) The total operating time of each affected source during the reporting period.
- (b) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.
- (c) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

[Authority for term: section 63.3400(c) of 40 CFR Part 63, Subpart JJJJ]

12. You must submit a Notification of Performance Tests as specified in 40 CFR Part 63.7 and 63.9(e) (see Attachment 2) if you are complying with the emission standard using a control device and you are required to conduct a performance test of the control device. This notification and the site-specific test plan required under 40 CFR Part 63.7(c)(2) (see Attachment 2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless EPA objects to the parameter or requests changes, you may consider the parameter approved.

[Authority for term: section 63.3400(d) of 40 CFR Part 63, Subpart JJJJ]

13. You must submit a Notification of Compliance Status as specified in 40 CFR Part 63.9(h) (see Attachment 2).

[Authority for term: section 63.3400(e) of 40 CFR Part 63, Subpart JJJJ]

14. You must submit performance test reports as specified in 40 CFR Part 63.10(d)(2) (see Attachment 2) if you are using a control device to comply with the emission standard and you have not obtained a waiver from the performance test requirement or you are not exempted from this requirement by section 63.3360(b) of 40 CFR Part 63, Subpart JJJJ. The performance test reports must be submitted as part of the notification of compliance status required in section A.IV.13 above.

[Authority for term: section 63.3400(f) of 40 CFR Part 63, Subpart JJJJ]

15. You must submit startup, shutdown, and malfunction reports as specified in 40 CFR Part 63.10(d)(5) (see Attachment 2), except that the provisions in Subpart A of 40 CFR Part 63 pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with 40 CFR Part 63, Subpart JJJJ.

a. If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by 40 CFR Part 63.6(e)(3) (see Attachment 2), the owner or operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to the Administrator (the Akron RAQMD).

b. Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in section 63.3400(c)(2)(vi) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: section 63.3400(g) of 40 CFR Part 63, Subpart JJJJ]

16. General reporting requirements.

a. On and after the date specified in section A.III.11.a of this permit by which the owner or operator must use monitoring that meets the requirements of 40 CFR Part 64, the owner or operator shall submit monitoring reports to the permitting authority in accordance with section 70.6(a)(3)(iii) of 40 CFR Part 70.

b. A report for monitoring under 40 CFR Part 64 shall include, at a minimum, the information required under section 70.6(a)(3)(iii) of 40 CFR Part 70 and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

iii. A description of the actions taken to implement a QIP during the reporting period as specified in section A.III.12 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

17. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

18. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

19. The permittee shall notify the permitting authority (the Akron RAQMD) upon any establishment or reestablishment of the thermal incinerator's average combustion temperature. The notification shall include the determination of the thermal incinerator's average combustion temperature value. The notification shall be submitted within 30 days following completion of the performance test(s). This notification may be included in the report require by section A.V.4 of this permit.

[Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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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 180 days of December 5, 2005 (see sections A.V.8 and A.V.9 below) and within 6 months prior to Title V permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.

c. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

i. 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.)

ii. 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 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.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity,

unless otherwise specified or approved by the Akron RAQMD.

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

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 RAQMD's refusal to accept the results of the emission test(s).

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

3. Personnel from the Akron RAQMD 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.

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

4. 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 RAQMD 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 RAQMD.

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

5. Methods in Appendix A of 40 CFR Part 60, except as provided under section 60.8(b) of 40 CFR Part 60, shall be used to determine compliance with 85 percent reduction in VOC emissions to the atmosphere as follows:

- a. Method 25A for VOC concentration (the calibration gas shall be propane);
- b. Method 1 for sample and velocity traverses;
- c. Method 2 for velocity and volumetric flow rates;
- d. Method 3 for gas analysis; and
- e. Method 4 for stack gas moisture.

[Authority for term: section 60.583(a)(2)-(a)(6) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05(C)]

6. To demonstrate compliance with 85 percent reduction in VOC emissions to the atmosphere, the permittee of an affected facility controlled by a solvent recovery emission control device or an incineration control device shall conduct a performance test to determine overall VOC emission control efficiency according to the following procedures:

a. The performance test shall consist of three runs. Each test run must last a minimum of 30 minutes and shall continue until the printing operation is interrupted or until 180 minutes of continuous operation occurs. During each test run, the print line shall be printing continuously and operating normally. The VOC emission reduction efficiency achieved for each test run is averaged over the entire test run period.

b. VOC concentration values at each site shall be measured simultaneously.

c. The volumetric flow rate shall be determined from one Method 2 measurement for each test run conducted immediately prior to, during, or after that test run. Volumetric flow rates at each site do not need to be measured simultaneously.

d. In order to determine capture efficiency from an affected facility, all fugitive VOC emissions from the affected facility shall be captured and vented through stacks suitable for measurement. During a performance test, the permittee of an affected facility located in an area with other sources of VOC shall isolate the affected facility from other sources of VOC. These two requirements shall be accomplished using one of the following methods:

- i. build a permanent enclosure around the affected facility;
- ii. build a temporary enclosure around the affected facility and duplicate, to an extent that is reasonably feasible, the ventilation conditions that are in effect when the affected facility is not enclosed (one way to do this is to divide the room exhaust rate by the volume of the room and then duplicate that quotient or 20 air changes per hour, whichever is smaller, in the temporary enclosure); or

- iii. shut down all other sources of VOC and continue to exhaust fugitive emissions from the affected facility through any building ventilation system and other room exhausts such as print line ovens and embossers.

e. For each affected facility, compliance with 85 percent reduction in VOC emissions to the atmosphere has been demonstrated if the average value of the overall control efficiency (EF) for the three runs is equal to or greater than 85 percent. An overall control efficiency is calculated for each run as follows:

i. For efficiency of the emission control device:

$$E = \frac{[(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n) - (\text{the summation of } (Q_{aj} \times C_{aj}) \text{ from } j=1 \text{ to } m)]}{(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n)}$$

ii. For efficiency of the vapor capture system:

$$F = \frac{[(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n)]}{[(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n) + (\text{the$$

summation of $(Q_{fk} \times C_{fk})$ from $k=1$ to p]

where:

E = the VOC emission reduction efficiency (as a fraction) of the emission control device during performance testing.

F = the VOC emission capture efficiency (as a fraction) of the vapor capture system during performance testing.

Q_{bi} = the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in standard cubic meters per hour.

C_{bi} = the concentration of VOC in each gas stream (i) for the time period entering the emission control device, in parts per million by volume.

Q_{aj} = the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in standard cubic meters per hour.

C_{aj} = the concentration of VOC in each gas stream (j) for the time period exiting the emission control device, in parts per million by volume.

Q_{fk} = the volumetric flow rate of each effluent gas stream (k) not directed to an emission control device, in standard cubic meters per hour.

C_{fk} = the concentration of VOC in each gas stream (k) for the time period which is not directed to an emission control device, in parts per million by volume.

[Authority for term: section 60.583(d) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05(C)]

7. The rotogravure print station and the reverse roll coater cannot be operated simultaneously. If the permittee can document that the reverse roll coater is a worst-case scenario and the testing requirements in sections A.V.5 and A.V.6 above are met and as long as Ohio EPA is in agreement that testing the reverse roll coater will satisfy the testing to show compliance with 40 CFR Part 60, Subpart FFF for the rotogravure print station, then the permittee will not have to do an additional stack test while the rotogravure print station is operating.

[Authority for term: OAC rule 3745-31-05(C)]

8. You must complete any performance test required in sections A.V.8 and A.V.9 of this permit within the time limits specified in 40 CFR 63.7(a)(2). See Table 2 of 40 CFR Part 63, Subpart JJJJ in Attachment 2.

Control device efficiency. If you are using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in sections A.V.8.a and A.V.8.b below. During the performance test, you must establish the operating limits required by section A.II.4 of this permit according to section A.V.8.c below.

a. An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously, and the data are reduced in accordance with the test methods and procedures in sections A.V.8.a.i through A.V.8.a.ix below. You must conduct three test runs as specified in 40 CFR 63.7(e)(3) (see Attachment 2), and each test run must last at least 1 hour.

i. Method 1 or 1A of 40 CFR Part 60, Appendix A, must be used for sample and velocity traverses to determine sampling locations.

ii. Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR Part 60, Appendix A, must be used to determine gas volumetric flow rate.

iii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A, must be used for gas analysis to determine dry molecular weight. You may also use as an alternative to Method 3B the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas in ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus]." (incorporated by reference, see section 63.14 of 40 CFR Part 63, Subpart A).

iv. Method 4 of 40 CFR Part 60, Appendix A, must be used to determine stack gas moisture.

v. The gas volumetric flow rate, dry molecular weight, and stack gas moisture must be determined during each test run specified in section A.V.8.a.vii below.

vi. Method 25 or 25A of 40 CFR Part 60, Appendix A, must be used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements which must be conducted simultaneously. You must submit notice of the intended test method to the Administrator for approval along with notification of the performance test required under 40 CFR 63.7(b) (see Attachment 2). You must use Method 25A if any of the conditions described in sections A.V.8.a.vi.(a) through A.V.8.a.vi.(d) below apply to the control device.

- (a) The control device is not an oxidizer.
- (b) The control device is an oxidizer but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ; or
- (c) The control device is an oxidizer but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or

- (d) The control device is an oxidizer but because of the high efficiency of the control device the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

vii. Except as provided in 40 CFR 63.7(e)(3) (see Attachment 2), each performance test must consist of three separate runs with each run conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic compound concentrations and mass flow rates, the average of the results of all the runs will apply.

viii. Volatile organic matter mass flow rates must be determined for each run specified in section A.V.8.a.vii above using Equation 1 of this section:

$$Mf = [Qsd] \times [Cc] \times [12] \times [0.0416] \times [10^{-6}] \text{ Eq. 1}$$

where:

Mf = Total organic volatile matter mass flow rate, kilograms (kg)/hour (h);

Qsd = Volumetric flow rate of gases entering or exiting the control device, as determined according to section A.V.8.a.ii above, dry standard cubic meters (dscm)/h;

Cc = Concentration of organic compounds as carbon, ppmv;

12.0 = Molecular weight of carbon; and

0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m³) (at 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

ix. For each run, emission control device destruction or removal efficiency must be determined using Equation 2 of this section:

$$E = (Mfi - Mfo)/(Mfi) \times 100 \text{ Eq. 2}$$

where:

E = Organic volatile matter control efficiency of the control device, percent;

Mfi = Organic volatile matter mass flow rate at the inlet to the control device, kg/h; and

Mfo = Organic volatile matter mass flow rate at the outlet of the control device, kg/h.

x. The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the test runs and calculated in Equation 2 of this section.

b. You must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of startup, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.

c. Operating limits. If you are using one or more add-on control device other than a solvent recovery system for which you conduct a liquid-liquid material balance to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must establish the applicable operating limits required by section A.II.4 of this permit. These operating limits apply to each add-on emission control device, and you must establish the operating limits during the performance test required by section A.V.8 according to the requirements in section A.V.8.c.i below.

i. Thermal oxidizer. If your add-on control device is a thermal oxidizer, establish the operating limits according to sections A.V.8.c.i.(a) and A.V.8.c.i.(b) below.

- (a) During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.
- (b) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

[Authority for term: sections 63.3330(a) and 63.3360(e) of 40 CFR Part 63, Subpart JJJJ]

9. If you demonstrate compliance by meeting the requirements of sections 63.3370(e), (f), (g), (h), (i)(2), (k), (n) (2) or (3), or (p) of 40 CFR Part 63, Subpart JJJJ, you must determine capture efficiency using the procedures in section A.V.9.a below.

a. You may assume your capture efficiency equals 100 percent if your capture system is a permanent total enclosure (PTE). You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR Part 51, Appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

[Authority for term: section 63.3360(f) of 40 CFR Part 63, Subpart JJJJ]

10. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be

determined in accordance with the following methods:

- a. Emission Limitation:

60.9 tpy of VOC as a rolling, 12-month summation for coatings

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping specified in sections A.III.1 and A.III.2 above.

[Authority for term: OAC rule 3745-31-05(C)]
- b. Emission Limitation:

96 percent control efficiency, by weight

98.2 percent capture efficiency, by weight.

Applicable Compliance Method:

Compliance with the control efficiency and capture efficiency shall be determined in accordance with test methods and procedures specified in sections A.V.1 through A.V.4 above.

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

5 percent, by weight, materials applied on the press by the product and packaging rotogravure printing operations

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping of the total mass of each material applied on the press and on the press by the product and packaging rotogravure printing operations specified in section A.III.6 above.

[Authority for term: OAC rule 3745-31-05(C)]
- d. Emission Limitation:

The permittee shall reduce the VOC emissions to the atmosphere by 85 percent from each affected facility

Applicable Compliance Method:

Compliance with the emission limitation shall be determined in accordance with test methods and procedures specified in sections A.V.5 through A.V.7 above.

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

20.3 lbs/hr of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping of coating usage, VOC content of each coating, and the operating hours per day specified in section A.III.1 above. US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

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

3.24 tpy of VOC as a rolling, 12-month summation for cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping specified in section A.III.2 above.

[Authority for term: OAC rule 3745-31-05(C)]
- g. Emission Limitation:

The permittee shall limit emissions to no more than 5 percent of the organic Hazardous Air Pollutants (HAP) applied for the month.

Applicable Compliance Method:

If you operate more than one capture system or more than one control device and only have always-controlled work stations, then you are in compliance with the emission standards in section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ for the month if for each web coating line or group of web coating lines controlled by a common control device: the overall organic HAP control efficiency as determined by sections A.V.10.g.i through A.V.10.g.iv below for each web coating line or group of web coating lines served by that control device and a common capture system is at least 95 percent at an existing affected source.

- i. Determine the oxidizer destruction efficiency using the procedure in section A.V.8 of this permit.
- ii. Determine the capture system capture efficiency in accordance with section A.V.9 of this permit.
- iii. Capture and control efficiency monitoring. Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with sections A.III.8 and A.III.9 of this permit to ensure capture and control efficiency.
- iv. Control efficiency. Calculate the overall organic HAP control efficiency achieved using Equation 11 below:

$$R = [(E) \times (CE)]/100 \text{ Eq. 11}$$

where:

R = Overall organic HAP control efficiency, percent;

E = Organic volatile matter control efficiency of the control device, percent; and

CE = Organic volatile matter capture efficiency of the capture system, percent.

[Authority for term: sections 63.3320(c) and 63.3370(k)(1)(i) through (iii), (k)(2)(i), and (p) of 40 CFR Part 63, Subpart JJJJ]

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VI. Miscellaneous Requirements

- 1. In delegating implementation and enforcement authority to a State under 40 CFR Part 63, Subpart E, the authorities contained in section A.VI.2 of this permit must be retained by the Administrator and not transferred to a State.

[Authority for term: section 63.3420(a) of 40 CFR Part 63, Subpart JJJJ]

- 2. Authority which will not be delegated to States: section 63.3360(c) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for organic HAP content determination; section 63.3360(d) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for volatile matter determination.

[Authority for term: section 63.3420(b) of 40 CFR Part 63, Subpart JJJJ]

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Facility ID: 1667040015 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed 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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Facility ID: 1667040015 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1667040015 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed 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>
reverse roll coater and rotogravure print station - 100 line coater, controlled with a thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 16-02186)	16.25 lbs/hr of volatile organic compounds (VOC) emissions for coatings and cleanup materials. The thermal incinerator shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, and a capture efficiency which is at least 92.2 percent, by weight, for VOC.
	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), 40 CFR Part 60, Subpart FFF, 40 CFR Part 63, Subparts A, KK, and JJJJ, and 40 CFR Part 64. 71.2 tpy of VOC emissions as a rolling, 12-month summation from all coatings and cleanup materials

OAC rule 3745-21-09(B)(6)	employed The emission control requirements specified by this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-09(H)	The emission control requirements specified by this applicable rule are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR Part 60, Subpart FFF	On and after the date on which the performance test required by section 60.8 of 40 CFR Part 60 has been completed, the permittee shall reduce the VOC emissions to the atmosphere by 85 percent from each affected facility.
40 CFR Part 63, Subpart KK	This emissions unit shall demonstrate compliance with 40 CFR Part 63, Subpart KK by meeting the requirements of 40 CFR Part 63.821(a)(2)(ii) as outlined in sections A.I.2.a and A.III.7 below.
40 CFR Part 63, Subpart JJJJ	HAP emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction). [Authority for term: section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ] Should Subpart JJJJ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation. The permittee shall comply with the applicable requirements of this rule by December 5, 2005 unless the deadline is changed by USEPA. [Authority for term: section 63.3330(a) of 40 CFR Part 63, Subpart JJJJ].
40 CFR Part 63, Subpart A	The applicable requirements for this rule are specified in Table 1 of 40 CFR Part 63, Subpart KK and in Table 2 of 40 CFR Part 63, Subpart JJJJ which are included in the text of Attachments 1 and 2 hereto, and are hereby incorporated into this permit as if fully written.
40 CFR Part 64	See sections A.II.1 and A.II.4, A.III.12 through A.III.16, and A.IV.17 through A.IV.20 below.

2. **Additional Terms and Conditions**

- a. The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations in each month shall never exceed 5 percent, by weight, of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations.

(a) [Authority for term: section 63.821(a)(2)(ii)(A) of 40 CFR Part 63, Subpart KK]

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II. **Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1) and 64.6(c)(2) of 40 CFR Part 64]

- 2. The VOC vented to the thermal incinerator from emissions units K003, K004, and K005 shall not exceed 554 pounds per hour.

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

- 3. For any web coating line or group of web coating lines for which you use add-on control devices, unless you use a solvent recovery system and conduct a liquid-liquid material balance, you must meet the following operating limits specified in Table 1 of 40 CFR Part 63, Subpart JJJJ (see Attachment 2). These operating limits apply to emission capture systems and control devices, and you must establish the operating limits during the performance test according to the requirements in section A.V.8.c of this permit. You must meet the operating limits at all times after you establish them.

[Authority for term: section 63.3321(a) and Table 1 of 40 CFR Part 63, Subpart JJJJ]

4. For each 3-hour period of operation, the differential pressure across the enclosure shall be greater than 0.007 inch of water column.

[Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
- the VOC emissions for all coatings and all cleanup materials employed, in tons per month (i.e., the summation of the daily emission rates from section A.III.2.g below); and
 - the rolling, 12-month summation of the emissions of VOC.

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

2. The permittee shall collect and record the following information for each day for the coating line:
- the name and identification number of each coating, as applied;
 - the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - the number of gallons of each coating and cleanup material employed;
 - the total uncontrolled VOC emissions from all coatings, in pounds per day;
 - the total uncontrolled VOC emissions from all cleanup materials, in pounds per day;
 - the calculated, controlled VOC emission rate for all coatings, in pounds per day (the controlled 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);
 - the total calculated VOC emission rate for all coatings and cleanup materials, in pounds per day (i.e., (e) plus (f));
 - the total number of hours the emissions unit was in operation;
 - the average hourly VOC emissions rate for all coating and cleanup materials in pound(s) per hour (i.e., (g)/(h));
 - the average hourly uncontrolled VOC emissions vented to the incinerator, in pounds per hour (i.e., (d)/(h)); and
 - the total average hourly VOC emissions vented to the incinerator, in pounds per hour from emissions units K003, K004, and K005.

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

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

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

4. The permittee shall collect and record the following information for each day for the control equipment:
- a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

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

5. The permittee of an affected facility controlled by a thermal incineration emission control device shall install, calibrate, operate, and maintain a monitoring device that continuously measures and records the temperature of the control device exhaust gases and shall comply with the following requirements:
- The continuous monitoring device shall be calibrated annually and have an accuracy of plus or minus 0.75 percent of the temperature being measured, expressed in degrees Celsius, or plus or minus 2.5 degrees Celsius, whichever is greater.
 - During the performance test, the permittee shall determine and record the average temperature of the control device exhaust gases. After the performance test, the permittee shall determine and record, in addition to the record made by the continuous monitoring device, the average temperature for each 3-hour clock period of printing operation when the average temperature of the exhaust gases is more than 28 degrees Celsius (50 degrees Fahrenheit) below the average temperature demonstrated during the most

recent performance test.

[Authority for term: section 60.584(b) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05(A)(3)]

6. The permittee of an affected facility shall record time periods of operation when an emission control device is not in use.

[Authority for term: section 60.584(d) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05(A)(3)]

7. In order to determine compliance with section A.I.2.a above, the permittee shall maintain the following records for 5 years and submit them to the Administrator (the Akron RAQMD) upon request:

a. the total mass of each material applied each month on the press, including all inboard and outboard stations;

b. the total mass of each material applied each month on the press by the product and packaging rotogravure printing operations; and

c. the weight percent of materials applied on the press by the product and packaging rotogravure printing operations (i.e., (b)/(a) times 100).

[Authority for term: section 63.829(f) of 40 CFR Part 63, Subpart KK and OAC rule 3745-31-05(A)(3)]

8. Following the date on which the initial performance test of a control device is completed to demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device used to comply with section 63.3320 of 40 CFR Part 63, Subpart JJJJ. You must install and operate the monitoring equipment as specified in section A.III.10 of this permit.

[Authority for term: section 63.3350(b) of 40 CFR Part 63, Subpart JJJJ]

9. If you are using a control device to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in section A.III.9.i below and section A.III.10 of this permit according to the requirements in sections A.III.9.a through A.III.9.h below.

a. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.

b. You must have valid data from at least 90 percent of the hours during which the process operated.

c. You must determine the hourly average of all recorded readings according to sections A.III.9.c.i and A.III.9.c.ii below.

i. To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.

ii. Provided all of the readings recorded in accordance with section A.III.9.c above clearly demonstrate continuous compliance with the standard that applies to you, then you are not required to determine the hourly average of all recorded readings.

d. You must determine the rolling, 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, you must have at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).

e. You must record the results of each inspection, calibration, and validation check of the CPMS.

f. At all times, you must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), you must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in section A.V.10.f of this permit. You must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

h. Any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation, and you must notify the Administrator (the Akron RAQMD) in accordance with section A.IV.12 of this permit.

i. If you are using an oxidizer to comply with the emission standards, you must comply with sections A.III.9.i.i through A.III.9.i.ii below.

i. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.

ii. For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of plus or minus 1 percent of the temperature being monitored in degrees Celsius, or plus or minus 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion

chamber at a location in the combustion zone.

[Authority for term: section 63.3350(e) of 40 CFR Part 63, Subpart JJJJ]

10. If you are complying with the emission standards in section 63.3320 of 40 CFR Part 63, subpart JJJJ through the use of a capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the information specified in sections A.III.10.a and A.III.10.b below for these capture systems. You must monitor the capture system in accordance with section A.III.10.c below. You must make the monitoring plan available for inspection by the permitting authority upon request.

a. The monitoring plan must:

i. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and

ii. Explain why this parameter is appropriate for demonstrating ongoing compliance; and

iii. Identify the specific monitoring procedures.

b. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

c. You must conduct all capture system monitoring in accordance with the plan.

d. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.

e. You must review and update the capture system monitoring plan at least annually.

[Authority for term: section 63.3350(f) of 40 CFR Part 63, Subpart JJJJ]

11. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must maintain the records specified in sections A.III.11.a and A.III.11.b below on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1) (see Attachment 2):

a. Records specified in 40 CFR 63.10(b)(2) (see Attachment 2) of all measurements needed to demonstrate compliance with this standard, including:

i. Control device and capture system operating parameter data in accordance with the requirements of sections A.III.9 and A.III.10 of this permit; and

ii. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of sections A.V.8 and A.V.9 of this permit.

b. Records specified in 40 CFR 63.10(c) (see Attachment 2) for each CMS operated by the owner or operator in accordance with the requirements of section A.III.8 of this permit.

[Authority for term: section 63.3410(a) of 40 CFR Part 63, Subpart JJJJ]

12. Operation of approved monitoring.

a. Commencement of operation. The owner or operator shall conduct the monitoring required under 40 CFR Part 64 upon issuance of a Part 70 or 71 permit that includes such monitoring.

b. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

d. Response to excursions or exceedances.

i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to,

monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

e. Documentation of need for improved monitoring. After approval of monitoring under 40 CFR Part 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: section 64.7 of 40 CFR Part 64]

13. Quality improvement plan (QIP) requirements.

a. Based on the results of a determination made under section A.III.12.d.ii of this permit, the Administrator or the permitting authority (the Akron RAQMD) may require the owner or operator to develop and implement a QIP. Consistent with section 64.6(c)(3) of 40 CFR Part 64, the Part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

b. Elements of a QIP:

i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

- (a) Improved preventive maintenance practices.
- (b) Process operation changes.
- (c) Appropriate improvements to control methods.
- (d) Other steps appropriate to correct control performance.
- (e) More frequent or improved monitoring (only in conjunction with one or more steps under sections A.III.13.b.ii.(a) through (d) above).

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to section A.III.12.d.ii of this permit, the Administrator or the permitting authority (the Akron RAQMD) may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

i. Failed to address the cause of the control device performance problems; or

ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[Authority for term: section 64.8 of 40 CFR Part 64]

14. General record keeping requirements.

a. The owner or operator shall comply with the record keeping requirements specified in section 70.6(a)(3)(ii) of 40 CFR Part 70. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to section A.III.13 of this permit and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

[Authority for term: section 64.9(b) of 40 CFR Part 64]

15. The permittee shall operate and maintain a continuous data acquisition system to monitor the thermal incinerator combustion temperature. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test.

If there is any excursion of the average thermal incinerator combustion temperature during the quarter, the permittee shall develop a QIP as required in section A.III.13 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

16. The permittee shall operate and maintain a continuous data acquisition system to monitor the differential pressure across the enclosure. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column.

If there is any excursion of the average differential pressure across the enclosure during the quarter, the permittee shall develop a QIP as required in section A.III.13 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

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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 incinerator, when the emissions unit was in operation, does not comply with the temperature limitation specified above.

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) and OAC rule 3745-31-05]
2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the average hourly VOC emissions exceeded 16.25 lbs/hr, and the actual average hourly VOC emissions for each such day.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.

[Authority for term: OAC rule 3745-31-05(C) and OAC rule 3745-77-07(C)(1)]
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
5. The permittee shall notify the Director (the Akron RAQMD) in writing of any exceedance of the VOC loading restriction of 554 lbs/hr. The notification shall include a copy of the exceedance determination and shall be sent to the Director (the Akron RAQMD) within 30 days of the occurrence.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
6. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit, in tons, for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
7. The permittee shall submit on a semiannual basis deviation (excursion) reports that include an identification of each month during which the weight-percent of materials applied on the press by the product and packaging rotogravure printing operations exceeded 5 percent, and the actual weight-percent of each such month. These reports shall be submitted by January 31 and July 31 of each year to the Administrator (the Akron RAQMD).

[Authority for term: section 63.860(b)(6) of 40 CFR Part 63, Subpart KK and OAC rule 3745-31-05(A)(3)]
8. The performance test data and results from the performance test to show compliance with 85 percent

reduction in VOC emissions to the atmosphere from the affected source shall be submitted to the Administrator (the Akron RAQMD) as specified in section 60.8(a) of 40 CFR Part 63, Subpart A.

[Authority for term: section 60.585(a) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05]

9. The permittee of each affected facility shall submit semiannual reports to the Administrator (the Akron RAQMD) of drops in the incinerator temperature as defined under section A.III.5.b of this permit. These reports shall be postmarked within 30 days following the end of the second and fourth calendar quarters.

[Authority for term: sections 60.585(b)(3) and 60.585(c) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05]

10. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must submit the reports specified in section A.IV.11 through A.IV.16 of this permit to the Administrator (the Akron RAQMD).

[Authority for term: section 63.3400(a) of 40 CFR Part 63, Subpart JJJJ]

11. You must submit an initial notification as required by 40 CFR 63.9(b) (see Attachment 2).

a. Initial notification for existing affected sources must be submitted no later than 1 year before December 5, 2005.

b. Initial notification for new and reconstructed affected sources must be submitted as required by 40 CFR 63.9(b) (see Attachment 2).

c. For the purpose of 40 CFR Part 63, Subpart JJJJ, a Title V or Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b) (see Attachment 2), provided the same information is contained in the permit application as required by 40 CFR 63.9(b) (see Attachment 2) and the State to which the permit application has been submitted has an approved operating permit program under Part 70 of this chapter and has received delegation of authority from the EPA to implement and enforce 40 CFR Part 63, Subpart JJJJ.

d. If you are using a permit application in lieu of an initial notification in accordance with section A.IV.11.c above, the permit application must be submitted by the same due date specified for the initial notification.

[Authority for term: section 63.3400(b) of 40 CFR Part 63, Subpart JJJJ]

12. You must submit a semiannual compliance report according to sections A.IV.12.a and A.IV.12.b below.

a. Compliance report dates.

i. The first compliance report must cover the period beginning on December 5, 2005 and ending on December 31.

ii. The first compliance report must be postmarked or delivered no later than January 31.

iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

v. For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to section 70.6(a)(3)(iii)(A) of 40 CFR Part 70 or section 71.6(a)(3)(iii)(A) of 40 CFR Part 71, you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in sections A.IV.12.a.i through A.IV.12.a.iv above.

b. The compliance report must contain the information in sections A.IV.12.b.i through A.IV.12.b.v below:

i. Company name and address.

ii. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.

iii. Date of report and beginning and ending dates of the reporting period.

iv. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

v. For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in 40 CFR Part 63, Subpart JJJJ, the compliance report must contain the information in sections A.IV.12.b.i through A.IV.12.b.iii above, and:

(a) The total operating time of each affected source during the reporting period.

(b) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(c) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

[Authority for term: section 63.3400(c) of 40 CFR Part 63, Subpart JJJJ]

13. You must submit a Notification of Performance Tests as specified in 40 CFR 63.7 and 63.9(e) (see

Attachment 2) if you are complying with the emission standard using a control device and you are required to conduct a performance test of the control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless EPA objects to the parameter or requests changes, you may consider the parameter approved.

[Authority for term: section 63.3400(d) of 40 CFR Part 63, Subpart JJJJ]

14. You must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) (see Attachment 2).

[Authority for term: section 63.3400(e) of 40 CFR Part 63, Subpart JJJJ]

15. You must submit performance test reports as specified in 40 CFR 63.10(d)(2) (see Attachment 2) if you are using a control device to comply with the emission standard and you have not obtained a waiver from the performance test requirement or you are not exempted from this requirement by section 63.3360(b) of 40 CFR Part 63, Subpart JJJJ. The performance test reports must be submitted as part of the notification of compliance status required in section A.IV.15 above.

[Authority for term: section 63.3400(f) of 40 CFR Part 63, Subpart JJJJ]

16. You must submit startup, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) (see Attachment 2), except that the provisions in Subpart A of 40 CFR Part 63 pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with 40 CFR Part 63, Subpart JJJJ.

a. If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by 40 CFR 63.6(e)(3) (see Attachment 2), the owner or operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to the Administrator (the Akron RAQMD).

b. Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in section 63.3400(c)(2)(vi) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: section 63.3400(g) of 40 CFR Part 63, Subpart JJJJ]

17. General reporting requirements.

a. On and after the date specified in section A.III.12.a of this permit by which the owner or operator must use monitoring that meets the requirements of 40 CFR Part 64, the owner or operator shall submit monitoring reports to the permitting authority in accordance with section 70.6(a)(3)(iii) of 40 CFR Part 70.

b. A report for monitoring under 40 CFR Part 64 shall include, at a minimum, the information required under section 70.6(a)(3)(iii) of 40 CFR Part 70 and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

iii. A description of the actions taken to implement a QIP during the reporting period as specified in section A.III.13 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

18. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

19. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

20. The permittee shall notify the permitting authority (the Akron RAQMD) upon any establishment or reestablishment of the thermal incinerator's average combustion temperature. The notification shall include the determination of the thermal incinerator's average combustion temperature value. The notification shall be submitted within 30 days following completion of the performance test(s). This notification may be included in the report require by section A.V.4 of this permit.

[Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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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 180 days of December 5, 2005 (see sections A.V.8 and A.V.9 below) and within 6 months prior to Title V permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC
 - c. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - i. 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.)
 - ii. 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 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.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(C), and OAC rule 3745-31-05(A)(3)]
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
3. Personnel from the Akron RAQMD 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.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
5. Methods in Appendix A of 40 CFR Part 60, except as provided under section 60.8(b) of 40 CFR Part 60, shall be used to determine compliance with 85 percent reduction in VOC emissions to the atmosphere as follows:
 - a. Method 25A for VOC concentration (the calibration gas shall be propane);
 - b. Method 1 for sample and velocity traverses;
 - c. Method 2 for velocity and volumetric flow rates;
 - d. Method 3 for gas analysis; and
 - e. Method 4 for stack gas moisture.

[Authority for term: section 60.583(a)(2) - (a)(6) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05]
6. To demonstrate compliance with 85 percent reduction in VOC emissions to the atmosphere, the permittee of an affected facility controlled by a solvent recovery emission control device or an incineration control device shall conduct a performance test to determine overall VOC emission control efficiency according to the following procedures:
 - a. The performance test shall consist of three runs. Each test run must last a minimum of 30 minutes and shall continue until the printing operation is interrupted or until 180 minutes of continuous operation occurs. During each test run, the print line shall be printing continuously and operating normally. The VOC emission reduction efficiency achieved for each test run is averaged over the entire test run period.
 - b. VOC concentration values at each site shall be measured simultaneously.
 - c. The volumetric flow rate shall be determined from one Method 2 measurement for each test run conducted immediately prior to, during, or after that test run. Volumetric flow rates at each site do not need

to be measured simultaneously.

d. In order to determine capture efficiency from an affected facility, all fugitive VOC emissions from the affected facility shall be captured and vented through stacks suitable for measurement. During a performance test, the permittee of an affected facility located in an area with other sources of VOC shall isolate the affected facility from other sources of VOC. These two requirements shall be accomplished using one of the following methods:

i. build a permanent enclosure around the affected facility;

ii. build a temporary enclosure around the affected facility and duplicate, to an extent that is reasonably feasible, the ventilation conditions that are in effect when the affected facility is not enclosed (one way to do this is to divide the room exhaust rate by the volume of the room and then duplicate that quotient or 20 air changes per hour, whichever is smaller, in the temporary enclosure); or

iii. shut down all other sources of VOC and continue to exhaust fugitive emissions from the affected facility through any building ventilation system and other room exhausts such as print line ovens and embossers.

e. For each affected facility, compliance with 85 percent reduction in VOC emissions to the atmosphere has been demonstrated if the average value of the overall control efficiency (EF) for the three runs is equal to or greater than 85 percent. An overall control efficiency is calculated for each run as follows:

i. For efficiency of the emission control device:

$$E = \frac{[(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n) - (\text{the summation of } (Q_{aj} \times C_{aj}) \text{ from } j=1 \text{ to } m)]}{[\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n]}$$

ii. For efficiency of the vapor capture system:

$$F = \frac{[(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n)]}{[(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n) + (\text{the summation of } (Q_{fk} \times C_{fk}) \text{ from } k=1 \text{ to } p)]}$$

where:

E = the VOC emission reduction efficiency (as a fraction) of the emission control device during performance testing;

F = the VOC emission capture efficiency (as a fraction) of the vapor capture system during performance testing;

Q_{bi} = the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in standard cubic meters per hour;

C_{bi} = the concentration of VOC in each gas stream (i) for the time period entering the emission control device, in parts per million by volume;

Q_{aj} = the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in standard cubic meters per hour;

C_{aj} = the concentration of VOC in each gas stream (j) for the time period exiting the emission control device, in parts per million by volume;

Q_{fk} = the volumetric flow rate of each effluent gas stream (k) not directed to an emission control device, in standard cubic meters per hour; and

C_{fk} = the concentration of VOC in each gas stream (k) for the time period which is not directed to an emission control device, in parts per million by volume.

[Authority for term: section 60.583(d) of 40 CFR Part 60, Subpart FFF and OAC rule 3745-31-05(A)(3)]

7. The rotogravure print station and the reverse roll coater cannot be operated simultaneously. If the permittee can document that the reverse roll coater is a worst-case scenario and the testing requirements in sections A.V.5 and A.V.6 above are met and as long as Ohio EPA is in agreement that testing the reverse roll coater will satisfy the testing to show compliance with 40 CFR Part 60, Subpart FFF for the rotogravure print station, then the permittee will not have to do an additional stack test while the rotogravure print station is operating.

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

8. You must complete any performance test required in sections A.V.8 and A.V.9 of this permit within the time limits specified in 40 CFR 63.7(a)(2). See Table 2 of 40 CFR Part 63, Subpart JJJJ in Attachment 2.

Control device efficiency. If you are using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in sections A.V.8.a and A.V.8.b below. During the performance test, you must establish the operating limits required by section A.II.3 of this permit according to section A.V.8.c below.

a. An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously, and the data are reduced in accordance with the test methods and procedures in sections A.V.8.a.i through A.V.8.a.ix below. You must conduct three test runs as specified in 40 CFR 63.7(e)(3) (see Attachment 2), and each test run must last at least 1 hour.

i. Method 1 or 1A of 40 CFR Part 60, Appendix A, must be used for sample and velocity traverses to determine sampling locations.

- ii. Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR Part 60, Appendix A, must be used to determine gas volumetric flow rate.
- iii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A, must be used for gas analysis to determine dry molecular weight. You may also use as an alternative to Method 3B the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas in ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus]." (incorporated by reference, see section 63.14 of 40 CFR Part 63, Subpart A).
- iv. Method 4 of 40 CFR Part 60, Appendix A, must be used to determine stack gas moisture.
- v. The gas volumetric flow rate, dry molecular weight, and stack gas moisture must be determined during each test run specified in section A.V.8.a.vii below.
- vi. Method 25 or 25A of 40 CFR Part 60, Appendix A, must be used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements which must be conducted simultaneously. You must submit notice of the intended test method to the Administrator for approval along with notification of the performance test required under 40 CFR 63.7(b) (see Attachment 2). You must use Method 25A if any of the conditions described in sections A.V.8.a.vi.(a) through A.V.8.a.vi.(d) below apply to the control device.
- (a) The control device is not an oxidizer.
- (b) The control device is an oxidizer but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ; or
- (c) The control device is an oxidizer but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or
- (d) The control device is an oxidizer but because of the high efficiency of the control device the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

vii. Except as provided in 40 CFR 63.7(e)(3) (see Attachment 2), each performance test must consist of three separate runs with each run conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic compound concentrations and mass flow rates, the average of the results of all the runs will apply.

viii. Volatile organic matter mass flow rates must be determined for each run specified in section A.V.8.a.vii above using Equation 1 of this section:

$$Mf = [Qsd] \times [Cc] \times [12] \times [0.0416] \times [10^{-6}] \text{ Eq. 1}$$

where:

Mf = Total organic volatile matter mass flow rate, kilograms (kg)/hour (h);

Qsd = Volumetric flow rate of gases entering or exiting the control device, as determined according to section A.V.8.a.ii above, dry standard cubic meters (dscm)/h;

Cc = Concentration of organic compounds as carbon, ppmv;

12.0 = Molecular weight of carbon; and

0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m^3) (at 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

ix. For each run, emission control device destruction or removal efficiency must be determined using Equation 2 of this section:

$$E = (Mfi - Mfo)/(Mfi) \times 100 \text{ Eq. 2}$$

where:

E = Organic volatile matter control efficiency of the control device, percent;

Mfi = Organic volatile matter mass flow rate at the inlet to the control device, kg/h; and

Mfo = Organic volatile matter mass flow rate at the outlet of the control device, kg/h.

x. The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the test runs and calculated in Equation 2 of this section.

b. You must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of startup, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.

c. Operating limits. If you are using one or more add-on control device other than a solvent recovery system for which you conduct a liquid-liquid material balance to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must establish the applicable operating limits required by section A.II.3 of this permit. These operating limits apply to each add-on emission control device, and you must establish the operating limits during the performance test required by

section A.V.8 above according to the requirements in section A.V.8.c.i below.

i. Thermal oxidizer. If your add-on control device is a thermal oxidizer, establish the operating limits according to sections A.V.8.c.i.(a) and A.V.8.c.i.(b) below.

- (a) During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.
- (b) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

[Authority for term: section 63.3360(e) of 40 CFR Part 63, Subpart JJJJ]

9. If you demonstrate compliance by meeting the requirements of sections 63.3370(e), (f), (g), (h), (i)(2), (k), (n) (2) or (3), or (p) of 40 CFR Part 63, subpart JJJJ, you must determine capture efficiency using the procedures in section A.V.9.a below.

a. You may assume your capture efficiency equals 100 percent if your capture system is a permanent total enclosure (PTE). You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR Part 51, Appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

[Authority for term: section 63.3360(f) of 40 CFR Part 63, Subpart JJJJ]

10. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

16.25 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping of coating and cleanup material usage, VOC content of each coating and cleanup material, and the operating hours per day as required by section A.III.2 above.

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

- b. Emission Limitation:

96 percent control efficiency, by weight

92.2 percent capture efficiency, by weight

Applicable Compliance Method:

Compliance with the control efficiency and capture efficiency shall be determined in accordance with test methods and procedures specified in sections A.V.1 through A.V.4 above.

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

- c. Emission Limitation:

71.2 tpy of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping specified in sections A.III.1 and A.III.2 above.

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

- d. Emission Limitation:

The permittee shall reduce the VOC emissions to the atmosphere by 85 percent from each affected facility

Applicable Compliance Method:

Compliance with the emission limitation shall be determined in accordance with test methods and procedures specified in sections A.V.5 through A.V.7 above.

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

- e. Emission Limitation:

5 percent, by weight, materials applied on the press by the product and packaging rotogravure printing

operations

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping of the total mass of each material applied on the press and on the press by the product and packaging rotogravure printing operations specified in section A.III.7 above.

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

f. Emission Limitation:

The permittee shall limit emissions to no more than 5 percent of the organic Hazardous Air Pollutants (HAP) applied for the month.

Applicable Compliance Method:

If you operate more than one capture system or more than one control device and only have always-controlled work stations, then you are in compliance with the emission standards in section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ for the month if for each web coating line or group of web coating lines controlled by a common control device, the overall organic HAP control efficiency as determined by sections A.V.10.f.i through A.V.10.f.iv below for each web coating line or group of web coating lines served by that control device and a common capture system is at least 95 percent at an existing affected source.

i. Determine the oxidizer destruction efficiency using the procedure in section A.V.8 of this permit.

ii. Determine the capture system capture efficiency in accordance with section A.V.9 of this permit.

iii. Capture and control efficiency monitoring. Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with sections A.III.9 and A.III.10 of this permit to ensure capture and control efficiency.

iv. Control efficiency. Calculate the overall organic HAP control efficiency achieved using Equation 11 below:

$$R = [(E) \times (CE)]/100 \text{ Eq. 11}$$

where:

R = Overall organic HAP control efficiency, percent;

E = Organic volatile matter control efficiency of the control device, percent; and

CE = Organic volatile matter capture efficiency of the capture system, percent.

[Authority for term: sections 63.3320(c) and 63.3370(k)(1)(i) through (iii), (k)(2)(i), and (p) of 40 CFR Part 63, Subpart JJJJ]

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VI. Miscellaneous Requirements

1. In delegating implementation and enforcement authority to a State under 40 CFR Part 63, Subpart E, the authorities contained in section A.VI.2 of this permit must be retained by the Administrator and not transferred to a State.

[Authority for term: section 63.3420(a) of 40 CFR Part 63, Subpart JJJJ]

2. Authority which will not be delegated to States: section 63.3360(c) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for organic HAP content determination; section 63.3360(d) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for volatile matter determination.

[Authority for term: section 63.3420(b) of 40 CFR Part 63, Subpart JJJJ]

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Facility ID: 1667040015 Emissions Unit ID: K003 Issuance type: Title V Preliminary Proposed 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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Facility ID: 1667040015 Emissions Unit ID: K004 Issuance type: Title V Preliminary Proposed 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>
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<p>reverse roll coater - 90 line coater, controlled with a thermal incinerator</p>	<p>OAC rule 3745-31-05(A)(3) (PTI 16-1601)</p>	<p>19.34 lbs/hr of volatile organic compounds (VOC) for coatings and cleanup materials</p> <p>84.7 tpy of VOC for coatings and cleanup materials</p> <p>The thermal incinerator shall achieve a control (destruction) efficiency which is at least 96%, by weight, and a capture efficiency which is at least 98.5%, by weight, for VOC.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(B)(3) (I), 40 CFR Part 63, Subparts A and JJJJ, and 40 CFR Part 64.</p>
	<p>OAC rule 3745-21-09(B)(6)</p>	<p>The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). See sections A.III.2 and A.III.3 below.</p>
	<p>OAC rule 3745-21-09(B)(3)(I) OAC rule 3745-21-09(H)</p>	<p>The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). HAP emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction).</p>
	<p>40 CFR Part 63, Subpart JJJJ</p>	<p>[Authority for term: section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ]</p> <p>Should Subpart JJJJ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>The permittee shall comply with the applicable requirements of this rule by December 5, 2005 unless the deadline is changed by USEPA.</p>
	<p>40 CFR Part 63, Subpart A</p>	<p>[Authority for term: section 63.3330(a) of 40 CFR Part 63, Subpart JJJJ].</p> <p>The applicable requirements for this rule are specified in Table 2 of 40 CFR Part 63, Subpart JJJJ which is included in the text of Attachment 2 hereto, and is hereby incorporated into this permit as if fully written.</p>
	<p>40 CFR Part 64</p>	<p>See sections A.II.1 and A.II.3, A.III.8 through A.III.12, and A.IV.12 through A.IV.15 below.</p>

2. **Additional Terms and Conditions**

(a) None

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II. **Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1) and 64.6(c)(2) of 40 CFR Part 64]
2. For any web coating line or group of web coating lines for which you use add-on control devices, unless you use a solvent recovery system and conduct a liquid-liquid material balance, you must meet the following operating limits specified in Table 1 of 40 CFR Part 63, Subpart JJJJ (see Attachment 2). These operating limits apply to emission capture systems and control devices, and you must establish the operating limits during the performance test according to the requirements in section A.V.5.c of this permit. You must meet the operating limits at all times after you establish them.

[Authority for term: section 63.3321(a) and Table 1 of 40 CFR Part 63, Subpart JJJJ]
3. For each 3-hour period of operation, the differential pressure across the enclosure shall be greater than 0.007 inch of water column.

[Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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

1. The permittee shall collect and record the following information for each day for the coating line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total uncontrolled VOC emissions from all coatings, in pounds per day;
 - e. the total uncontrolled VOC emissions from all cleanup materials employed inside the permanent total enclosure (PTE), in pounds per day;
 - f. the total uncontrolled VOC emissions from all cleanup materials employed outside the PTE, in pounds per day;
 - g. the calculated, controlled VOC emission rate for all coatings, in pounds per day (the controlled 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);
 - h. the calculated, controlled VOC emission rate for all cleanup materials employed inside the PTE, in pounds per day (the controlled 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);
 - i. the total calculated VOC emission rate for all coatings and cleanup materials, in pounds per day (i.e., (f) plus (g) plus (h));
 - j. the total number of hours the emissions unit was in operation; and
 - k. the average hourly VOC emissions rate for all coating and cleanup materials in pound(s) per hour (i.e., (i)/(j)).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]
3. The permittee shall collect and record the following information for each day:
 - a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance; and
 - b. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

[Authority for term: OAC rule 3745-21-09(B)(3)(l)(i)-(ii) and OAC rule 3745-77-07(C)(1)]
4. Following the date on which the initial performance test of a control device is completed to demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device used to comply with section 63.3320 of 40 CFR Part 63, Subpart JJJJ. You must install and operate the monitoring equipment as specified in section A.III.6 of this permit.

[Authority for term: section 63.3350(b) of 40 CFR Part 63, Subpart JJJJ]
5. If you are using a control device to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in section A.III.5.i below and section A.III.6 of this permit according to the requirements in sections A.III.5.a through A.III.5.h below.
 - a. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.
 - b. You must have valid data from at least 90 percent of the hours during which the process operated.
 - c. You must determine the hourly average of all recorded readings according to sections A.III.5.c.i and A.III.5.c.ii below.
 - i. To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.
 - ii. Provided all of the readings recorded in accordance with section A.III.5.c above clearly demonstrate continuous compliance with the standard that applies to you, then you are not required to determine the hourly average of all recorded readings.
 - d. You must determine the rolling, 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, you must have at least two of three of the hourly

averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).

e. You must record the results of each inspection, calibration, and validation check of the CPMS.

f. At all times, you must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), you must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in section A.V.7.c of this permit. You must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

h. Any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation, and you must notify the Administrator (the Akron RAQMD) in accordance with section A.IV.7 of this permit.

i. If you are using an oxidizer to comply with the emission standards, you must comply with sections A.III.5.i.i through A.III.5.i.ii below.

i. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.

ii. For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of plus or minus 1 percent of the temperature being monitored in degrees Celsius, or plus or minus 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

[Authority for term: section 63.3350(e) of 40 CFR Part 63, Subpart JJJJ]

6. If you are complying with the emission standards in section 63.3320 of 40 CFR Part 63, subpart JJJJ through the use of a capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the information specified in sections A.III.6.a and A.III.6.b below for these capture systems. You must monitor the capture system in accordance with section A.III.6.c below. You must make the monitoring plan available for inspection by the permitting authority upon request.

a. The monitoring plan must:

i. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and

ii. Explain why this parameter is appropriate for demonstrating ongoing compliance; and

iii. Identify the specific monitoring procedures.

b. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

c. You must conduct all capture system monitoring in accordance with the plan.

d. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.

e. You must review and update the capture system monitoring plan at least annually.

[Authority for term: section 63.3350(f) of 40 CFR Part 63, Subpart JJJJ]

7. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must maintain the records specified in sections A.III.7.a and A.III.7.b below on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1) (see Attachment 2):

a. Records specified in 40 CFR 63.10(b)(2) (see Attachment 2) of all measurements needed to demonstrate compliance with this standard, including:

i. Control device and capture system operating parameter data in accordance with the requirements of sections A.III.5 and A.III.6 of this permit; and

ii. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of sections A.V.5 and A.V.6 of this permit.

b. Records specified in 40 CFR 63.10(c) (see Attachment 2) for each CMS operated by the owner or operator in accordance with the requirements of section A.III.4 of this permit.

[Authority for term: section 63.3410(a) of 40 CFR Part 63, Subpart JJJJ]

8. Operation of approved monitoring.

a. Commencement of operation. The owner or operator shall conduct the monitoring required under 40 CFR

Part 64 upon issuance of a Part 70 or 71 permit that includes such monitoring.

b. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

d. Response to excursions or exceedances.

i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

e. Documentation of need for improved monitoring. After approval of monitoring under 40 CFR Part 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: section 64.7 of 40 CFR Part 64]

9. Quality improvement plan (QIP) requirements.

a. Based on the results of a determination made under section A.III.8.d.ii of this permit, the Administrator or the permitting authority (the Akron RAQMD) may require the owner or operator to develop and implement a QIP. Consistent with section 64.6(c)(3) of 40 CFR Part 64, the Part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

b. Elements of a QIP:

i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

- (a) Improved preventive maintenance practices.
- (b) Process operation changes.
- (c) Appropriate improvements to control methods.
- (d) Other steps appropriate to correct control performance.
- (e) More frequent or improved monitoring (only in conjunction with one or more steps under sections A.III.9.b.ii.(a) through (d) above).

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to section A.III.8.d.ii of this permit, the Administrator or the permitting authority (the Akron RAQMD) may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

i. Failed to address the cause of the control device performance problems; or

- ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[Authority for term: section 64.8 of 40 CFR Part 64]

10. General record keeping requirements.

a. The owner or operator shall comply with the record keeping requirements specified in section 70.6(a)(3) (ii) of 40 CFR Part 70. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to section A.III.9 of this permit and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

[Authority for term: section 64.9(b) of 40 CFR Part 64]

11. The permittee shall operate and maintain a continuous data acquisition system to monitor the thermal incinerator combustion temperature. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test.

If there is any excursion of the average thermal incinerator combustion temperature during the quarter, the permittee shall develop a QIP as required in section A.III.9 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

12. The permittee shall operate and maintain a continuous data acquisition system to monitor the differential pressure across the enclosure. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column.

If there is any excursion of the average differential pressure across the enclosure during the quarter, the permittee shall develop a QIP as required in section A.III.9 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

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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 incinerator, when the emissions unit was in operation, does not comply with the temperature limitation specified above.

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) and OAC rule 3745-31-05]

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions exceeded 19.34 lbs/hr, and the actual average hourly VOC emissions for each such day.

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

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

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

4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit, in tons, for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.

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

5. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must submit the reports specified in sections A.IV.6 through A.IV.11 of this permit to the Administrator (the Akron RAQMD).

[Authority for term: section 63.3400(a) of 40 CFR Part 63, Subpart JJJJ]

6. You must submit an initial notification as required by 40 CFR 63.9(b) (see Attachment 2).

a. Initial notification for existing affected sources must be submitted no later than 1 year before December 5, 2005.

b. Initial notification for new and reconstructed affected sources must be submitted as required by 40 CFR 63.9(b) (see Attachment 2).

c. For the purpose of 40 CFR Part 63, Subpart JJJJ, a Title V or Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b) (see Attachment 2), provided the same information is contained in the permit application as required by 40 CFR 63.9(b) (see Attachment 2) and the State to which the permit application has been submitted has an approved operating permit program under Part 70 of this chapter and has received delegation of authority from the EPA to implement and enforce 40 CFR Part 63, Subpart JJJJ.

d. If you are using a permit application in lieu of an initial notification in accordance with section A.IV.6.c above, the permit application must be submitted by the same due date specified for the initial notification.

[Authority for term: section 63.3400(b) of 40 CFR Part 63, Subpart JJJJ]

7. You must submit a semiannual compliance report according to sections A.IV.7.a and A.IV.7.b below.

a. Compliance report dates.

i. The first compliance report must cover the period beginning on December 5, 2005 and ending on December 31.

ii. The first compliance report must be postmarked or delivered no later than January 31.

iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

v. For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to section 70.6(a)(3)(iii)(A) of 40 CFR Part 70 or section 71.6(a)(3)(iii)(A) of 40 CFR Part 71, you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in sections A.IV.7.a.i through A.IV.7.a.iv above.

b. The compliance report must contain the information in sections A.IV.7.b.i through A.IV.7.b.v below:

i. Company name and address.

ii. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.

iii. Date of report and beginning and ending dates of the reporting period.

iv. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

v. For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in 40 CFR Part 63, Subpart JJJJ, the compliance report must contain the information in sections A.IV.7.b.i through A.IV.7.b.iii above, and:

(a) The total operating time of each affected source during the reporting period.

(b) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(c) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

[Authority for term: section 63.3400(c) of 40 CFR Part 63, Subpart JJJJ]

8. You must submit a Notification of Performance Tests as specified in 40 CFR 63.7 and 63.9(e) (see Attachment 2) if you are complying with the emission standard using a control device and you are required to conduct a performance test of the control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) (see Attachment 2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless EPA objects to the parameter or requests changes, you may consider the parameter approved.
- [Authority for term: section 63.3400(d) of 40 CFR Part 63, Subpart JJJJ]
9. You must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) (see Attachment 2).
- [Authority for term: section 63.3400(e) of 40 CFR Part 63, Subpart JJJJ]
10. You must submit performance test reports as specified in 40 CFR 63.10(d)(2) (see Attachment 2) if you are using a control device to comply with the emission standard and you have not obtained a waiver from the performance test requirement or you are not exempted from this requirement by section 63.3360(b) of 40 CFR Part 63, Subpart JJJJ. The performance test reports must be submitted as part of the notification of compliance status required in section A.IV.9 above.
- [Authority for term: section 63.3400(f) of 40 CFR Part 63, Subpart JJJJ]
11. You must submit startup, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) (see Attachment 2), except that the provisions in Subpart A of 40 CFR Part 63 pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with 40 CFR Part 63, Subpart JJJJ.
- a. If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by 40 CFR 63.6(e)(3) (see Attachment 2), the owner or operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to the Administrator (the Akron RAQMD).
- b. Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in section 63.3400(c)(2)(vi) of 40 CFR Part 63, Subpart JJJJ.
- [Authority for term: section 63.3400(g) of 40 CFR Part 63, Subpart JJJJ]
12. General reporting requirements.
- a. On and after the date specified in section A.III.8.a of this permit by which the owner or operator must use monitoring that meets the requirements of 40 CFR Part 64, the owner or operator shall submit monitoring reports to the permitting authority in accordance with section 70.6(a)(3)(iii) of 40 CFR Part 70.
- b. A report for monitoring under 40 CFR Part 64 shall include, at a minimum, the information required under section 70.6(a)(3)(iii) of 40 CFR Part 70 and the following information, as applicable:
- i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- iii. A description of the actions taken to implement a QIP during the reporting period as specified in section A.III.9 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.
- [Authority for term: section 64.9(a) of 40 CFR Part 64]
13. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- [Authority for term: section 64.9(a) of 40 CFR Part 64]
14. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- [Authority for term: section 64.9(a) of 40 CFR Part 64]
15. The permittee shall notify the permitting authority (the Akron RAQMD) upon any establishment or reestablishment of the thermal incinerator's average combustion temperature. The notification shall include the determination of the thermal incinerator's average combustion temperature value. The notification shall be submitted within 30 days following completion of the performance test(s). This notification may be included in the report require by section A.V.4 of this permit.
- [Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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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 180 days of December 5, 2005 (see sections A.V.5 and A.V.6 below) and within 6 months prior to Title V permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC
 - c. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - i. 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.)
 - ii. 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 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.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(C), and OAC rule 3745-31-05(A)(3)]
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 RAQMD's refusal to accept the results of the emission test(s).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
3. Personnel from the Akron RAQMD 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.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
5. You must complete any performance test required in sections A.V.5 and A.V.6 of this permit within the time limits specified in 40 CFR 63.7(a)(2). See Table 2 of 40 CFR Part 63, Subpart JJJJ in Attachment 2.

Control device efficiency. If you are using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in sections A.V.5.a and A.V.5.b below. During the performance test, you must establish the operating limits required by section A.II.2 of this permit according to section A.V.5.c below.

 - a. An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously, and the data are reduced in accordance with the test methods and procedures in sections A.V.5.a.i through A.V.5.a.ix below. You must conduct three test runs as specified in 40 CFR 63.7(e)(3) (see Attachment 2), and each test run must last at least 1 hour.
 - i. Method 1 or 1A of 40 CFR Part 60, Appendix A, must be used for sample and velocity traverses to determine sampling locations.
 - ii. Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR Part 60, Appendix A, must be used to determine gas volumetric flow rate.
 - iii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A, must be used for gas analysis to determine dry molecular weight. You may also use as an alternative to Method 3B the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas in ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus]," (incorporated by reference, see section 63.14 of 40 CFR Part 63, Subpart A).
 - iv. Method 4 of 40 CFR Part 60, Appendix A, must be used to determine stack gas moisture.

v. The gas volumetric flow rate, dry molecular weight, and stack gas moisture must be determined during each test run specified in section A.V.5.a.vii below.

vi. Method 25 or 25A of 40 CFR Part 60, Appendix A, must be used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements which must be conducted simultaneously. You must submit notice of the intended test method to the Administrator for approval along with notification of the performance test required under 40 CFR 63.7(b) (see Attachment 2). You must use Method 25A if any of the conditions described in sections A.V.5.a.vi.(a) through A.V.5.a.vi.(d) below apply to the control device.

- (a) The control device is not an oxidizer.
- (b) The control device is an oxidizer but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ; or
- (c) The control device is an oxidizer but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or
- (d) The control device is an oxidizer but because of the high efficiency of the control device the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

vii. Except as provided in 40 CFR 63.7(e)(3) (see Attachment 2), each performance test must consist of three separate runs with each run conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic compound concentrations and mass flow rates, the average of the results of all the runs will apply.

viii. Volatile organic matter mass flow rates must be determined for each run specified in section A.V.5.a.vii above using Equation 1 of this section:

$$Mf = [Qsd] \times [Cc] \times [12] \times [0.0416] \times [10^{-6}] \text{ Eq. 1}$$

where:

Mf = Total organic volatile matter mass flow rate, kilograms (kg)/hour (h);

Qsd = Volumetric flow rate of gases entering or exiting the control device, as determined according to section A.V.5.a.ii above, dry standard cubic meters (dscm)/h;

Cc = Concentration of organic compounds as carbon, ppmv;

12.0 = Molecular weight of carbon; and

0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m^3) (at 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

ix. For each run, emission control device destruction or removal efficiency must be determined using Equation 2 of this section:

$$E = [(Mfi - Mfo)/(Mfi)] \times 100 \text{ Eq. 2}$$

where:

E = Organic volatile matter control efficiency of the control device, percent;

Mfi = Organic volatile matter mass flow rate at the inlet to the control device, kg/h; and

Mfo = Organic volatile matter mass flow rate at the outlet of the control device, kg/h.

x. The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the test runs and calculated in Equation 2 of this section.

b. You must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of startup, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.

c. Operating limits. If you are using one or more add-on control device other than a solvent recovery system for which you conduct a liquid-liquid material balance to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must establish the applicable operating limits required by section A.II.2 of this permit. These operating limits apply to each add-on emission control device, and you must establish the operating limits during the performance test required by section A.V.5 above according to the requirements in section A.V.5.c.i below.

i. Thermal oxidizer. If your add-on control device is a thermal oxidizer, establish the operating limits according to sections A.V.5.c.i.(a) and A.V.5.c.i.(b) below.

- (a) During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial

heat exchange occurs.

- (b) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

[Authority for term: section 63.3360(e) of 40 CFR Part 63, Subpart JJJJ]

6. If you demonstrate compliance by meeting the requirements of sections 63.3370(e), (f), (g), (h), (i)(2), (k), (n) (2) or (3), or (p) of 40 CFR Part 63, Subpart JJJJ, you must determine capture efficiency using the procedures in section A.V.6.a below.

a. You may assume your capture efficiency equals 100 percent if your capture system is a permanent total enclosure (PTE). You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR Part 51, Appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

[Authority for term: section 63.3360(f) of 40 CFR Part 63, Subpart JJJJ]

7. 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:

19.34 lbs/hr of VOC

84.7 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping of coating and cleanup material usage, VOC content of each coating and cleanup material, and the operating hours per day as required by section A.III.1 above and the emission testing requirement specified in section A.V.1 above.

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

- b. Emission Limitations:

96 percent control efficiency, by weight

98.5 percent capture efficiency, by weight

Applicable Compliance Method:

Compliance with the control efficiency and capture efficiency shall be determined in accordance with test methods and procedures specified in sections A.V.1 through A.V.4 above.

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

- c. Emission Limitation:

The permittee shall limit emissions to no more than 5 percent of the organic Hazardous Air Pollutants (HAP) applied for the month.

Applicable Compliance Method:

If you operate more than one capture system or more than one control device and only have always-controlled work stations, then you are in compliance with the emission standards in section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ for the month if for each web coating line or group of web coating lines controlled by a common control device, the overall organic HAP control efficiency as determined by sections A.V.7.c.i through A.V.7.c.iv below for each web coating line or group of web coating lines served by that control device and a common capture system is at least 95 percent at an existing affected source.

i. Determine the oxidizer destruction efficiency using the procedure in section A.V.5 of this permit.

ii. Determine the capture system capture efficiency in accordance with section A.V.6 of this permit.

iii. Capture and control efficiency monitoring. Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with sections A.III.5 and A.III.6 of this permit to ensure capture and control efficiency.

iv. Control efficiency. Calculate the overall organic HAP control efficiency achieved using Equation 11 below:

$$R = [(E) \times (CE)]/100 \text{ Eq. 11}$$

where:

R = Overall organic HAP control efficiency, percent;

E = Organic volatile matter control efficiency of the control device, percent; and

CE = Organic volatile matter capture efficiency of the capture system, percent.

[Authority for term: sections 63.3320(c) and 63.3370(k)(1)(i) through (iii), (k)(2)(i), and (p) of 40 CFR Part 63, Subpart JJJJ]

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VI. Miscellaneous Requirements

1. In delegating implementation and enforcement authority to a State under 40 CFR part 63, subpart E, the authorities contained in section A.VI.2 of this permit must be retained by the Administrator and not transferred to a State.

[Authority for term: section 63.3420(a) of 40 CFR Part 63, Subpart JJJJ]

2. Authority which will not be delegated to States: section 63.3360(c) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for organic HAP content determination; section 63.3360(d) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for volatile matter determination.

[Authority for term: section 63.3420(b) of 40 CFR Part 63, Subpart JJJJ]

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Facility ID: 1667040015 Emissions Unit ID: K004 Issuance type: Title V Preliminary Proposed 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>
reverse roll coater - 90 line coater, controlled with a thermal incinerator	none	See section B.III.1 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 K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3): 426.7

MAGLC (ug/m3): 14047.6

Pollutant: Toluene

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3): 426.7

MAGLC (ug/m3): 4476.2

Pollutant: Cyclohexanone

TLV (mg/m3): 100.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3): 426.7

MAGLC (ug/m3): 2380.95

Pollutant: Xylene

TLV (mg/m3): 434.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3): 426.7

MAGLC (ug/m3): 10,333.33

* The maximum hourly rate is the combined VOC allowable mass emission rate from K003, K004, and K005 (emissions for these three emissions units exit the same stack).

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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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: 1667040015 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed 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>
rotary screen printing and rotogravure printing, controlled with a thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 16-1601)	7.83 lbs/hr of volatile organic compounds (VOC) for coatings and cleanup materials 34.3 tpy of VOC for coatings and cleanup materials The thermal incinerator shall achieve a control (destruction) efficiency which is at least 96%, by weight, and a capture efficiency which is at least 95%, by weight, for VOC.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart FFF, 40 CFR Part 63, Subparts A, KK and JJJJ, and 40 CFR Part 64.
	40 CFR Part 60, Subpart FFF	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). On and after the date on which the performance test required by section 60.8 of 40 CFR Part 60 has been completed, the owner or operator subject to 40 CFR Part 60, Subpart FFF shall reduce VOC emissions to the atmosphere by 85 percent from each affected facility.
	40 CFR Part 63, Subpart KK	This emissions unit shall demonstrate compliance with 40 CFR Part 63, Subpart KK by meeting the requirements of section 63.821(a)(2)(ii) of 40 CFR Part 63, Subpart KK as outlined in sections A.I.2.a and A.III.6 below.
	40 CFR Part 63, Subpart JJJJ	HAP emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction). [Authority for term: section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ] Should Subpart JJJJ be revised during the term of this permit, the permittee shall comply with the applicable

requirements of the most recent promulgation.

The permittee shall comply with the applicable requirements of this rule by December 5, 2005 unless the deadline is changed by USEPA.

[Authority for term: section 63.3330(a) of 40 CFR Part 63, Subpart JJJJ].

40 CFR Part 63, Subpart A

The applicable requirements for this rule are specified in Table 1 of 40 CFR Part 63, Subpart KK and in Table 2 of 40 CFR Part 63, Subpart JJJJ which are included in the text of Attachments 1 and 2 hereto, and are hereby incorporated into this permit as if fully written.

40 CFR Part 64

See sections A.II.1 and A.II.3, A.III.11 through A.III.15, and A.IV.15 through A.IV.18 below.

2. Additional Terms and Conditions

- a. The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print stations in each month shall never exceed 5 weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations

(a)

[Authority for term: section 63.821(a)(2)(ii)(A) of 40 CFR Part 63, Subpart KK]

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II. Operational Restrictions

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1) and 64.6(c)(2) of 40 CFR Part 64]

- 2. For any web coating line or group of web coating lines for which you use add-on control devices, unless you use a solvent recovery system and conduct a liquid-liquid material balance, you must meet the following operating limits specified in Table 1 of 40 CFR Part 63, Subpart JJJJ (see Attachment 2). These operating limits apply to emission capture systems and control devices, and you must establish the operating limits during the performance test according to the requirements in section A.V.7.c of this permit. You must meet the operating limits at all times after you establish them.

[Authority for term: section 63.3321(a) and Table 1 of 40 CFR Part 63, Subpart JJJJ]

- 3. For each 3-hour period of operation, the differential pressure across the enclosure shall be greater than 0.007 inch of water column.

[Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each day for the coating line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total uncontrolled VOC emissions from all coatings, in pounds per day;
 - e. the total uncontrolled VOC emissions from all cleanup materials employed inside the permanent total enclosure (PTE), in pounds per day;
 - f. the total uncontrolled VOC emissions from all cleanup materials employed outside the PTE, in pounds per day;
 - g. the calculated, controlled VOC emission rate for all coatings, in pounds per day (the controlled 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);
 - h. the calculated, controlled VOC emission rate for all cleanup materials employed inside the PTE, in pounds per day (the controlled 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);

i. the total calculated VOC emission rate for all coatings and cleanup materials, in pounds per day (i.e., (f) plus (g) plus (h));

j. the total number of hours the emissions unit was in operation; and

k. the average hourly VOC emissions rate for all coating and cleanup materials in pound(s) per hour (i.e., (i)/(j)).

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

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

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

3. 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 incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit(s) was (were) in compliance.

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

4. The owner or operator of an affected facility controlled by a thermal incineration emission control device shall install, calibrate, operate, and maintain a monitoring device that continuously measures and records the temperature of the control device exhaust gases and shall comply with the following requirements:

a. The continuous monitoring device shall be calibrated annually and have an accuracy of plus or minus 0.75 percent of the temperature being measured, expressed in degrees Celsius, or plus or minus 2.5 degrees Celsius, whichever is greater.

b. During the performance test, the owner or operator shall determine and record the average temperature of the control device exhaust gases. After the performance test, the permittee shall determine and record, in addition to the record made by the continuous monitoring device, the average temperature for each 3-hour clock period of printing operation when the average temperature of the exhaust gases is more than 28 degrees Celsius (50 degrees Fahrenheit) below the average temperature demonstrated during the most recent performance test.

[Authority for term: section 60.584(b) of 40 CFR Part 60, Subpart FFF]

5. The owner or operator of an affected facility shall record time periods of operation when an emission control device is not in use.

[Authority for term: section 60.584(d) of 40 CFR Part 60, Subpart FFF]

6. The owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of section A.I.2.a of this permit shall maintain the records specified in sections A.III.6.a and A.III.6.b below for 5 years and submit them to the Administrator (the Akron RAQMD) upon request:

a. the total mass of each material applied each month on the press, including all inboard and outboard stations; and

b. the total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.

[Authority for term: section 63.829(f) of 40 CFR Part 63, Subpart KK]

7. Following the date on which the initial performance test of a control device is completed to demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device used to comply with section 63.3320 of 40 CFR Part 63, Subpart JJJJ. You must install and operate the monitoring equipment as specified in section A.III.9 of this permit.

[Authority for term: section 63.3350(b) of 40 CFR Part 63, Subpart JJJJ]

8. If you are using a control device to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in section A.III.8.i below and section A.III.9 of this permit according to the requirements in sections A.III.8.a through A.III.8.h below.

a. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.

b. You must have valid data from at least 90 percent of the hours during which the process operated.

c. You must determine the hourly average of all recorded readings according to sections A.III.8.c.i and A.III.8.c.ii below.

i. To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.

ii. Provided all of the readings recorded in accordance with section A.III.8.c above clearly demonstrate continuous compliance with the standard that applies to you, then you are not required to determine the hourly average of all recorded readings.

d. You must determine the rolling, 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, you must have at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).

e. You must record the results of each inspection, calibration, and validation check of the CPMS.

f. At all times, you must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), you must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in section A.V.9.d of this permit. You must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

h. Any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation, and you must notify the Administrator (the Akron RAQMD) in accordance with section A.IV.10 of this permit.

i. If you are using an oxidizer to comply with the emission standards, you must comply with sections A.III.8.i.i through A.III.8.i.ii below.

i. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.

ii. For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of plus or minus 1 percent of the temperature being monitored in degrees Celsius, or plus or minus 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

[Authority for term: section 63.3350(e) of 40 CFR Part 63, Subpart JJJJ]

9. If you are complying with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ through the use of a capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the information specified in sections A.III.9.a and A.III.9.b below for these capture systems. You must monitor the capture system in accordance with section A.III.9.c below. You must make the monitoring plan available for inspection by the permitting authority upon request.

a. The monitoring plan must:

i. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and

ii. Explain why this parameter is appropriate for demonstrating ongoing compliance; and

iii. Identify the specific monitoring procedures.

b. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

c. You must conduct all capture system monitoring in accordance with the plan.

d. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.

e. You must review and update the capture system monitoring plan at least annually.

[Authority for term: section 63.3350(f) of 40 CFR Part 63, Subpart JJJJ]

10. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must maintain the records specified in sections A.III.10.a and A.III.10.b below on a monthly basis in accordance with the requirements of 40 CFR Part 63.10(b)(1) (see Attachment 2):

a. Records specified in 40 CFR Part 63.10(b)(2) (see Attachment 2) of all measurements needed to demonstrate compliance with this standard, including:

- i. Control device and capture system operating parameter data in accordance with the requirements of sections A.III.8 and A.III.9 of this permit; and
 - ii. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of sections A.V.7 and A.V.8 of this permit.
- b. Records specified in 40 CFR 63.10(c) (see Attachment 2) for each CMS operated by the owner or operator in accordance with the requirements of section A.III.7 of this permit.

[Authority for term: section 63.3410(a) of 40 CFR Part 63, Subpart JJJJ]
11. Operation of approved monitoring.
 - a. Commencement of operation. The owner or operator shall conduct the monitoring required under 40 CFR Part 64 upon issuance of a Part 70 or 71 permit that includes such monitoring.
 - b. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - c. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
 - d. Response to excursions or exceedances.
 - i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
 - e. Documentation of need for improved monitoring. After approval of monitoring under 40 CFR Part 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: section 64.7 of 40 CFR Part 64]
12. Quality improvement plan (QIP) requirements.
 - a. Based on the results of a determination made under section A.III.11.d.ii of this permit, the Administrator or the permitting authority (the Akron RAQMD) may require the owner or operator to develop and implement a QIP. Consistent with section 64.6(c)(3) of 40 CFR Part 64, the Part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.
 - b. Elements of a QIP:
 - i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.
 - ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:
 - (a) Improved preventive maintenance practices.
 - (b) Process operation changes.
 - (c) Appropriate improvements to control methods.
 - (d) Other steps appropriate to correct control performance.

- (e) More frequent or improved monitoring (only in conjunction with one or more steps under sections A.III.12.b.ii.(a) through (d) above).

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to section A.III.11.d.ii of this permit the Administrator or the permitting authority (the Akron RAQMD) may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

i. Failed to address the cause of the control device performance problems; or

ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[Authority for term: section 64.8 of 40 CFR Part 64]

13. General record keeping requirements.

a. The owner or operator shall comply with the record keeping requirements specified in section 70.6(a)(3) (ii) of 40 CFR Part 70. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to section A.III.12 of this permit and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

[Authority for term: section 64.9(b) of 40 CFR Part 64]

14. The permittee shall operate and maintain a continuous data acquisition system to monitor the thermal incinerator combustion temperature. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test.

If there is any excursion of the average thermal incinerator combustion temperature during the quarter, the permittee shall develop a QIP as required in section A.III.12 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

15. The permittee shall operate and maintain a continuous data acquisition system to monitor the differential pressure across the enclosure. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column.

If there is any excursion of the average differential pressure across the enclosure during the quarter, the permittee shall develop a QIP as required in section A.III.12 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in section A.II.1 of this permit.

[Authority for term: 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 include an identification of each day during which the VOC emissions exceeded 7.83 lbs/hr, and the actual average hourly VOC emissions for each such day.

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

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

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

4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit, in tons, for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

5. The performance test data and results from the performance test to show compliance with 85 percent reduction in VOC emissions to the atmosphere from the affected source shall be submitted to the Administrator (the Akron RAQMD) as specified in section 60.8(a) of 40 CFR Part 63, Subpart A.

[Authority for term: section 60.585(a) of 40 CFR Part 60, Subpart FFF]

6. The permittee of each affected facility shall submit semiannual reports to the Administrator (the Akron RAQMD) of drops in the incinerator temperature as defined under section A.III.4.b of this permit. These reports shall be postmarked within 30 days following the end of the second and fourth calendar quarters.

[Authority for term: section 60.585(b)(3) and 60.585(c) of 40 CFR Part 60, Subpart FFF]

7. A summary report specified in section 63.10(e)(3) of 40 CFR Part 63, Subpart A (see Attachment 1) shall be submitted on a semiannual basis (i.e., once every 6-month period). In addition to a report of operating parameter exceedances as required by section 63.10(e)(3)(i) of 40 CFR Part 63, Subpart A (see Attachment 1), the summary report shall include exceedances of the criterion of section A.I.2.a of this permit.

[Authority for term: section 63.830(b)(6) of 40 CFR Part 63, Subpart KK]

8. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must submit the reports specified in sections A.IV.9 through A.IV.14 of this permit to the Administrator (the Akron RAQMD).

[Authority for term: section 63.3400(a) of 40 CFR Part 63, Subpart JJJJ]

9. You must submit an initial notification as required by 40 CFR 63.9(b) (see Attachment 2).

- a. Initial notification for existing affected sources must be submitted no later than 1 year before December 5, 2005.

- b. Initial notification for new and reconstructed affected sources must be submitted as required by 40 CFR 63.9(b) (see Attachment 2).

- c. For the purpose of 40 CFR Part 63, Subpart JJJJ, a Title V or Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b) (see Attachment 2), provided the same information is contained in the permit application as required by 40 CFR 63.9(b) (see Attachment 2) and the State to which the permit application has been submitted has an approved operating permit program under Part 70 of this chapter and has received delegation of authority from the EPA to implement and enforce 40 CFR Part 63, Subpart JJJJ.

- d. If you are using a permit application in lieu of an initial notification in accordance with section A.IV.9.c above, the permit application must be submitted by the same due date specified for the initial notification.

[Authority for term: section 63.3400(b) of 40 CFR Part 63, Subpart JJJJ]

10. You must submit a semiannual compliance report according to sections A.IV.10.a and A.IV.10.b below.

- a. Compliance report dates.

- i. The first compliance report must cover the period beginning on December 5, 2005 and ending on December 31.

- ii. The first compliance report must be postmarked or delivered no later than January 31.

- iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

- iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

- v. For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to section 70.6(a)(3)(iii)(A) of 40 CFR Part 70 or section 71.6(a)(3)(iii)(A) of 40 CFR Part 71, you may submit the first and subsequent compliance reports according to the dates the permitting authority (the Akron RAQMD) has established instead of according to the dates in sections A.IV.10.a.i through A.IV.10.a.iv above.

- b. The compliance report must contain the information in sections A.IV.10.b.i through A.IV.10.b.v below:

- i. Company name and address.
 - ii. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
 - iii. Date of report and beginning and ending dates of the reporting period.
 - iv. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
 - v. For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in 40 CFR Part 63, Subpart JJJJ, the compliance report must contain the information in sections A.IV.10.b.i through A.IV.10.b.iii above, and:
 - (a) The total operating time of each affected source during the reporting period.
 - (b) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.
 - (c) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

[Authority for term: section 63.3400(c) of 40 CFR Part 63, Subpart JJJJ]
11. You must submit a Notification of Performance Tests as specified in 40 CFR 63.7 and 63.9(e) (see Attachment 2) if you are complying with the emission standard using a control device and you are required to conduct a performance test of the control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) (see Attachment 2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless EPA objects to the parameter or requests changes, you may consider the parameter approved.
- [Authority for term: section 63.3400(d) of 40 CFR Part 63, Subpart JJJJ]
12. You must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) (see Attachment 2).
- [Authority for term: section 63.3400(e) of 40 CFR Part 63, Subpart JJJJ]
13. You must submit performance test reports as specified in 40 CFR 63.10(d)(2) (see Attachment 2) if you are using a control device to comply with the emission standard and you have not obtained a waiver from the performance test requirement or you are not exempted from this requirement by section 63.3360(b) of 40 CFR Part 63, Subpart JJJJ. The performance test reports must be submitted as part of the notification of compliance status required in section A.IV.12 above.
- [Authority for term: section 63.3400(f) of 40 CFR Part 63, Subpart JJJJ]
14. You must submit startup, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) (see Attachment 2), except that the provisions in Subpart A of 40 CFR Part 63 pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with 40 CFR Part 63, Subpart JJJJ.
- a. If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by 40 CFR 63.6(e)(3) (see Attachment 2), the owner or operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to the Administrator (the Akron RAQMD)).
 - b. Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in section 63.3400(c)(2)(vi) of 40 CFR Part 63, Subpart JJJJ.
- [Authority for term: section 63.3400(g) of 40 CFR Part 63, Subpart JJJJ]
15. General reporting requirements.
- a. On and after the date specified in section A.III.11.a of this permit by which the owner or operator must use monitoring that meets the requirements of 40 CFR Part 64, the owner or operator shall submit monitoring reports to the permitting authority in accordance with section 70.6(a)(3)(iii) of 40 CFR Part 70.
 - b. A report for monitoring under 40 CFR Part 64 shall include, at a minimum, the information required under section 70.6(a)(3)(iii) of 40 CFR Part 70 and the following information, as applicable:
 - i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - iii. A description of the actions taken to implement a QIP during the reporting period as specified in section A.III.12 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

16. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

17. The permittee shall submit quarterly deviation (excursion) reports that include an identification of all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

18. The permittee shall notify the permitting authority (the Akron RAQMD) upon any establishment or reestablishment of the thermal incinerator's average combustion temperature. The notification shall include the determination of the thermal incinerator's average combustion temperature value. The notification shall be submitted within 30 days following completion of the performance test(s). This notification may be included in the report require by section A.V.4 of this permit.

[Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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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:
- The emission testing shall be conducted within 180 days of December 5, 2005 (see sections A.V.7 and A.V.8 below) and within 6 months prior to Title V permit expiration.
 - The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.
 - The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - 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.)
 - 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 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.
 - The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.
- [Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(C), and OAC rule 3745-31-05(A)(3)]
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 RAQMD's refusal to accept the results of the emission test(s).
- [Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
3. Personnel from the Akron RAQMD 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.
- [Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
4. 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 RAQMD 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 RAQMD.
- [Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]
5. Methods in Appendix A of 40 CFR Part 60, except as provided under section 60.8(b) of 40 CFR Part 60, shall be used to determine compliance with 85 percent reduction in VOC emissions to the atmosphere as follows:

- a. Method 25A for VOC concentration (the calibration gas shall be propane);
- b. Method 1 for sample and velocity traverses;
- c. Method 2 for velocity and volumetric flow rates;
- d. Method 3 for gas analysis; and
- e. Method 4 for stack gas moisture.

[Authority for term: section 60.583(a)(2) - (a)(6) of 40 CFR Part 60, Subpart FFF]

6. To demonstrate compliance with 85 percent reduction in VOC emissions to the atmosphere, the owner or operator of an affected facility controlled by a solvent recovery emission control device or an incineration control device shall conduct a performance test to determine overall VOC emission control efficiency according to the following procedures:
- a. The performance test shall consist of three runs. Each test run must last a minimum of 30 minutes and shall continue until the printing operation is interrupted or until 180 minutes of continuous operation occurs. During each test run, the print line shall be printing continuously and operating normally. The VOC emission reduction efficiency achieved for each test run is averaged over the entire test run period.
 - b. VOC concentration values at each site shall be measured simultaneously.
 - c. The volumetric flow rate shall be determined from one Method 2 measurement for each test run conducted immediately prior to, during, or after that test run. Volumetric flow rates at each site do not need to be measured simultaneously.
 - d. In order to determine capture efficiency from an affected facility, all fugitive VOC emissions from the affected facility shall be captured and vented through stacks suitable for measurement. During a performance test, the permittee of an affected facility located in an area with other sources of VOC shall isolate the affected facility from other sources of VOC. These two requirements shall be accomplished using one of the following methods:
 - i. build a permanent enclosure around the affected facility;
 - ii. build a temporary enclosure around the affected facility and duplicate, to an extent that is reasonably feasible, the ventilation conditions that are in effect when the affected facility is not enclosed (one way to do this is to divide the room exhaust rate by the volume of the room and then duplicate that quotient or 20 air changes per hour, whichever is smaller, in the temporary enclosure); or
 - iii. shut down all other sources of VOC and continue to exhaust fugitive emissions from the affected facility through any building ventilation system and other room exhausts such as print line ovens and embossers.
 - e. For each affected facility, compliance with 85 percent reduction in VOC emissions to the atmosphere has been demonstrated if the average value of the overall control efficiency (EF) for the three runs is equal to or greater than 85 percent. An overall control efficiency is calculated for each run as follows:
 - i. For efficiency of the emission control device:

$$E = \frac{[(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n) - (\text{the summation of } (Q_{aj} \times C_{aj}) \text{ from } j=1 \text{ to } m)]}{(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n)}$$
 - ii. For efficiency of the vapor capture system:

$$F = \frac{[(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n)]}{[(\text{the summation of } (Q_{bi} \times C_{bi}) \text{ from } i=1 \text{ to } n) + (\text{the summation of } (Q_{fk} \times C_{fk}) \text{ from } k=1 \text{ to } p)]}$$
- where:
- E = the VOC emission reduction efficiency (as a fraction) of the emission control device during performance testing;
 - F = the VOC emission capture efficiency (as a fraction) of the vapor capture system during performance testing;
 - Q_{bi} = the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in standard cubic meters per hour;
 - C_{bi} = the concentration of VOC in each gas stream (i) for the time period entering the emission control device, in parts per million by volume;
 - Q_{aj} = the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in standard cubic meters per hour;
 - C_{aj} = the concentration of VOC in each gas stream (j) for the time period exiting the emission control device, in parts per million by volume;
 - Q_{fk} = the volumetric flow rate of each effluent gas stream (k) not directed to an emission control device, in standard cubic meters per hour; and
 - C_{fk} = the concentration of VOC in each gas stream (k) for the time period which is not directed to an emission control device, in parts per million by volume.

[Authority for term: section 60.538(d) of 40 CFR Part 60, Subpart FFF]

7. You must complete any performance test required in sections A.V.7 and A.V.8 of this permit within the time

limits specified in 40 CFR 63.7(a)(2). See Table 2 of 40 CFR Part 63, Subpart JJJJ in Attachment 2.

Control device efficiency. If you are using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in sections A.V.7.a and A.V.7.b below. During the performance test, you must establish the operating limits required by section A.II.2 of this permit according to section A.V.7.c below.

a. An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously, and the data are reduced in accordance with the test methods and procedures in sections A.V.7.a.i through A.V.7.a.ix below. You must conduct three test runs as specified in 40 CFR 63.7(e)(3) (see Attachment 2), and each test run must last at least 1 hour.

i. Method 1 or 1A of 40 CFR Part 60, Appendix A, must be used for sample and velocity traverses to determine sampling locations.

ii. Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR Part 60, Appendix A, must be used to determine gas volumetric flow rate.

iii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A, must be used for gas analysis to determine dry molecular weight. You may also use as an alternative to Method 3B the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas in ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus]," (incorporated by reference, see section 63.14 of 40 CFR Part 63, Subpart A).

iv. Method 4 of 40 CFR Part 60, Appendix A, must be used to determine stack gas moisture.

v. The gas volumetric flow rate, dry molecular weight, and stack gas moisture must be determined during each test run specified in section A.V.7.a.vii below.

vi. Method 25 or 25A of 40 CFR Part 60, Appendix A, must be used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements which must be conducted simultaneously. You must submit notice of the intended test method to the Administrator for approval along with notification of the performance test required under 40 CFR 63.7(b) (see Attachment 2). You must use Method 25A if any of the conditions described in sections A.V.7.a.vi.(a) through A.V.7.a.vi.(d) below apply to the control device.

- (a) The control device is not an oxidizer.
- (b) The control device is an oxidizer but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ; or
- (c) The control device is an oxidizer but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or
- (d) The control device is an oxidizer but because of the high efficiency of the control device the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

vii. Except as provided in 40 CFR 63.7(e)(3) (see Attachment 2), each performance test must consist of three separate runs with each run conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic compound concentrations and mass flow rates, the average of the results of all the runs will apply.

viii. Volatile organic matter mass flow rates must be determined for each run specified in section A.V.7.a.vii above using Equation 1 of this section:

$$Mf = [Qsd] \times [Cc] \times [12] \times [0.0416] \times [10^{-6}] \text{ Eq. 1}$$

where:

Mf = Total organic volatile matter mass flow rate, kilograms (kg)/hour (h);

Qsd = Volumetric flow rate of gases entering or exiting the control device, as determined according to section A.V.7.a.ii above, dry standard cubic meters (dscm)/h;

Cc = Concentration of organic compounds as carbon, ppmv;

12.0 = Molecular weight of carbon; and

0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m³) (at 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

ix. For each run, emission control device destruction or removal efficiency must be determined using Equation 2 of this section:

$$E = [(Mfi - Mfo)/(Mfi)] \times 100 \text{ Eq. 2}$$

where:

E = Organic volatile matter control efficiency of the control device, percent;

Mfi = Organic volatile matter mass flow rate at the inlet to the control device, kg/h; and

Mfo = Organic volatile matter mass flow rate at the outlet of the control device, kg/h.

x. The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the test runs and calculated in Equation 2 of this section.

b. You must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of startup, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.

c. Operating limits. If you are using one or more add-on control device other than a solvent recovery system for which you conduct a liquid-liquid material balance to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must establish the applicable operating limits required by section A.II.2 of this permit. These operating limits apply to each add-on emission control device, and you must establish the operating limits during the performance test required by section A.V.7 above according to the requirements in section A.V.7.c.i below.

i. Thermal oxidizer. If your add-on control device is a thermal oxidizer, establish the operating limits according to sections A.V.7.c.i.(a) and A.V.7.c.i.(b) below.

- (a) During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.
- (b) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

[Authority for term: section 63.3360(e) of 40 CFR Part 63, Subpart JJJJ]

- 8. If you demonstrate compliance by meeting the requirements of sections 63.3370(e), (f), (g), (h), (i)(2), (k), (n) (2) or (3), or (p) of 40 CFR Part 63, Subpart JJJJ, you must determine capture efficiency using the procedures in section A.V.8.a below.

a. You may assume your capture efficiency equals 100 percent if your capture system is a permanent total enclosure (PTE). You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR Part 51, Appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

[Authority for term: section 63.3360(f) of 40 CFR Part 63, Subpart JJJJ]

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

- a. Emission Limitations:

7.83 lbs/hr of VOC

34.3 TPY of VOC

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping of coating and cleanup material usage, VOC content of each coating and cleanup material, and the operating hours per day as required by section A.III.1 above and the emission testing requirements specified in section A.V.1 above.

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

- b. Emission Limitations:

96 percent control efficiency, by weight

95 percent capture efficiency, by weight

Applicable Compliance Method:

Compliance with the control efficiency and capture efficiency shall be determined in accordance with test methods and procedures specified in sections A.V.1 through A.V.4 above.

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

- c. Emission Limitation:

5 percent, by weight, materials applied on the press by the product and packaging rotogravure printing operations

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping of the total mass of

each material applied on the press and on the press by the product and packaging rotogravure printing operations specified in section A.III.6 above.

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

d. Emission Limitation:

The permittee shall limit emissions to no more than 5 percent of the organic Hazardous Air Pollutants (HAP) applied for the month.

Applicable Compliance Method:

If you operate more than one capture system or more than one control device and only have always-controlled work stations, then you are in compliance with the emission standards in section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ for the month if for each web coating line or group of web coating lines controlled by a common control device, the overall organic HAP control efficiency as determined by sections A.V.9.d.i through A.V.9.d.iv below for each web coating line or group of web coating lines served by that control device and a common capture system is at least 95 percent at an existing affected source.

i. Determine the oxidizer destruction efficiency using the procedure in section A.V.7 of this permit.

ii. Determine the capture system capture efficiency in accordance with section A.V.8 of this permit.

iii. Capture and control efficiency monitoring. Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with sections A.III.8 and A.III.9 of this permit to ensure capture and control efficiency.

iv. Control efficiency. Calculate the overall organic HAP control efficiency achieved using Equation 11 below:

$$R = [(E) \times (CE)]/100 \text{ Eq. 11}$$

where:

R = Overall organic HAP control efficiency, percent;

E = Organic volatile matter control efficiency of the control device, percent; and

CE = Organic volatile matter capture efficiency of the capture system, percent.

[Authority for term: sections 63.3320(c) and 63.3370(k)(1)(i) through (iii), (k)(2)(i), and (p) of 40 CFR Part 63, Subpart JJJJ]

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VI. **Miscellaneous Requirements**

1. In delegating implementation and enforcement authority to a State under 40 CFR Part 63, Subpart E, the authorities contained in section A.VI.2 of this permit must be retained by the Administrator and not transferred to a State.

[Authority for term: section 63.3420(a) of 40 CFR Part 63, Subpart JJJJ]

2. Authority which will not be delegated to States: section 63.3360(c) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for organic HAP content determination; section 63.3360(d) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for volatile matter determination.

[Authority for term: section 63.3420(b) of 40 CFR Part 63, Subpart JJJJ]

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Facility ID: 1667040015 Emissions Unit ID: K005 Issuance type: Title V Preliminary Proposed 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>
rotary screen printing and rotogravure printing, controlled with a thermal incinerator	none	See section B.III.1 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 K005 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 14047.6

Pollutant: Toluene

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 4476.2

Pollutant: Cyclohexanone

TLV (mg/m3): 100.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 2380.95

Pollutant: Xylene

TLV (mg/m3): 434.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 10,333.33

* The maximum hourly rate is the combined VOC allowable mass emission rate from K003, K004, and K005 (emissions for these three emissions units exit the same stack).

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied.

Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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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: 1667040015 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed 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.

Applicable Emissions Limitations/Control

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Measures</u>
silk screen printing machine	OAC rule 3745-31-05(A)(3) (PTI 16-1557)	8 pounds of organic compounds (OC) per hour for coatings and photochemically reactive cleanup materials
		40 pounds of OC per day for coatings and photochemically reactive cleanup materials
		10.6 tons of OC per year for coatings and cleanup materials
	OAC rule 3745-21-07(G)(2)	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).

2. **Additional Terms and Conditions**

- (a) None

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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 for each day for the coating operation:
- the company identification for each coating and photochemically reactive cleanup material employed;
 - the number of gallons of each coating and photochemically reactive cleanup material employed;
 - the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - the total number of hours the emissions unit was in operation; and
 - the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

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

2. The permittee shall collect and record the following information monthly for the purpose of determining annual OC emissions:
- the company identification for each cleanup material which does not meet the definition of a photochemically reactive material as defined OAC rule 3745-21-01(C)(5) that was employed;
 - the number of gallons of each cleanup material which does not meet the definition of a photochemically reactive material as defined OAC rule 3745-21-01(C)(5) that was employed;
 - the OC content of each cleanup material which does not meet the definition of a photochemically reactive material as defined OAC rule 3745-21-01(C)(5), in pounds per gallon; and
 - the total OC emission rate for all cleanup materials which do not meet the definition of a photochemically reactive material as defined OAC rule 3745-21-01(C)(5), in pounds or tons;
 - the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds or tons; and
 - the total OC emission rate for all coatings and cleanup materials, in tons.

[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 quarterly deviation (excursion) reports that include the following information:
- an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC

emissions for each such day; and

b. an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

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

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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

3. 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 January 31 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 Limitations:

8 pounds of OC per hour for coatings and photochemically reactive cleanup materials

40 pounds of OC per day for coatings and photochemically reactive cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping of coating and photochemically reactive cleanup material usage, OC content of each coating and photochemically reactive cleanup material, and operating hours per day as required by section A.III.1 above.

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

b. Emission Limitation:

10.6 tons of OC per year for coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping as required by section A.III.2 above.

[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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Facility ID: 1667040015 Emissions Unit ID: K006 Issuance type: Title V Preliminary Proposed 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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Facility ID: 1667040015 Emissions Unit ID: K007 Issuance type: Title V Preliminary Proposed 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>
UV Coater - equipment consists of a coating station and a rotogravure printer in line with a UV curing station, controlled with a thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 16-02376)	Volatile organic compounds (VOC) shall not exceed 2.5 pounds of per hour for coatings employed and 12.0 tons of VOC per year for coatings and cleanup material employed and shall have at least a 95% overall control efficiency for VOC.

The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart FFF, 40 CFR Part 63, Subparts AA, KK, and JJJJ, and 40 CFR Part 64.

See sections A.I.2.b and A.I.2.c below.

OAC rule 3745-21-09(B)(6)

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).

OAC rule 3745-21-09(H)(2)

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).

40 CFR Part 60, Subpart FFF

On and after the date on which the performance test required by section 60.8 of 40 CFR Part 60, Subpart A has been completed, each owner or operator subject to this subpart shall use inks with a weighted average VOC content less than 1.0 kilogram VOC per kilogram ink solids at each affected facility.

40 CFR Part 63, Subpart KK

[Authority for term: section 60.582(a)(1) of 40 CFR Part 60, Subpart FFF]

This emissions unit shall demonstrate compliance with 40 CFR Part 63, Subpart KK by meeting the requirements of section 63.821(a)(2)(ii) of 40 CFR Part 63, Subpart KK as outlined in sections A.I.2.a and A.III.7 below.

40 CFR Part 63, Subpart JJJJ

HAP emissions shall be limited to no more than 5 percent of the organic HAP applied for each month (95 percent reduction).

[Authority for term: section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ]

Should Subpart JJJJ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.

The permittee shall comply with the applicable requirements of this rule by December 5, 2005 unless the deadline is changed by USEPA.

40 CFR Part 63, Subpart A

[Authority for term: section 63.3330(a) of 40 CFR Part 63, Subpart JJJJ].

The applicable requirements for this rule are specified in Table 1 of 40 CFR Part 63, Subpart KK and in Table 2 of 40 CFR Part 63, Subpart JJJJ which are included in the text of Attachments 1 and 2 hereto, and are hereby incorporated into this permit as if fully written.

40 CFR Part 64

See sections A.II.1 and A.II.4, A.III.12 through A.III.16, and A.IV.16 through A.IV.19 below.

2. Additional Terms and Conditions

- a. The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print stations in each month shall never exceed 5 weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press in that month, including all inboard and outboard stations.

(a) [Authority for term: section 63.821(a)(2)(ii)(A) of 40 CFR Part 63, Subpart KK and OAC rule 3745-31-05]

- b. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

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

- c. The hourly VOC emission limitation regulated per OAC rule 3745-31-05(A)(3) is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

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(A)(1)]

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II. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit or 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.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1) and 64.6(c)(2) of 40 CFR Part 64]

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water or a minimum facial velocity of 200 feet per minute as confirmed during the most recent emission test that demonstrated the emissions unit was in compliance, whenever the emissions unit is in operation.

This operational restriction does not apply during time periods when an individual is entering or exiting the permanent total enclosure.

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

3. For any web coating line or group of web coating lines for which you use add-on control devices, unless you use a solvent recovery system and conduct a liquid-liquid material balance, you must meet the operating limits specified in Table 1 of 40 CFR Part 63, Subpart JJJJ (see Attachment 2). These operating limits apply to emission capture systems and control devices, and you must establish the operating limits during the performance test according to the requirements in section A.V.5.c of this permit. You must meet the operating limits at all times after you establish them.

[Authority for term: section 63.3321(a) and Table 1 of 40 CFR Part 63, Subpart JJJJ]

4. For each 3-hour period of operation, the differential pressure across the enclosure shall be greater than 0.007 inch of water column.

[Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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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;
 - b. the linear yard of material processed;
 - c. the VOC emissions from the coatings employed, in tons (i.e., (b) times the derived pound(s) of VOC per linear yard of material processed emission factor*, then divided by 2000 pounds per ton);
 - d. the name and identification number of each cleanup material employed;
 - e. the number of gallons of each cleanup material employed;
 - f. the VOC content of each cleanup material, in pounds per gallon;
 - g. the VOC emissions from all cleanup materials employed, in tons (i.e., (e) times (f), then divided by 2000 pounds per ton);
 - h. the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in tons (i.e., (c) plus (g)); and
 - i. the calculated total controlled VOC emission rate from all coatings and cleanup materials employed, in tons (the controlled 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).

*The emission factors were developed per the "UV Coater Emission Experiment" documents dated June 14, 2002 and May 11, 2004.

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

2. If any of the operating parameters established in the "UV Coater Emissions Experiment" documents dated either June 14, 2002 or May 11, 2004 are to change, the permittee shall reevaluate the emission factor prior to implementing the process changes in order to verify compliance with the hourly emission limitation for VOC. The reevaluation of the emission factor shall be kept on site and available for inspection during regular office hours. If at any point it is determined that based on the potential to emit calculation for VOC that the hourly emission limitation could be exceeded, the permittee shall either apply for and obtain a permit to install modification or develop daily record keeping to verify the actual average hourly emissions of VOC do not exceed the allowable hourly emission limitation for VOC.

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

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

The permittee shall collect and record the following information 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 incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

4. The permittee shall install, maintain, and operate monitoring devices which simultaneously measure the pressure inside and outside the permanent total enclosure or which measure the facial velocity through each natural draft opening. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area(s) or the facial velocity for each natural draft opening; and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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

5. To demonstrate compliance with section 60.582(a)(1) of 40 CFR Part 60, Subpart FFF, the owner or operator of an affected facility shall determine the weighted average VOC content of the inks according to the following procedures:

- a. Determine and record the VOC content and amount of each ink used at the print head, including the VOC content and amount of diluent solvent, for any time periods when VOC emission control equipment is not used.

- b. Compute the weighted average VOC content by the following equation:

$$G = \frac{\text{the summation of } (W_{oi} \times M_{ci}) \text{ from } i=1 \text{ to } n + \text{the summation of } (W_{oj} \times M_{dj}) \text{ from } j=1 \text{ to } m}{\text{the summation of } (M_{ci} \times W_{si}) \text{ from } i=1 \text{ to } n}$$

where:

G = the weighted average mass of VOC per mass of ink solids applied, in kilograms per kilogram;

W_{oi} = the weight fraction of VOC in each ink (i) used in the time period as determined from Reference Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram;

M_{ci} = the total mass of each ink (i) applied in the time period as determined from plant records, in kilograms;

W_{oj} = the weight fraction of VOC in each dilution solvent (j) added at the print line in the time period determined from Reference Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram;

M_{dj} = the total mass of each dilution solvent (j) added at the print line in the time period determined from plant records, in kilograms; and

W_{si} = means the weight fraction of solids in each ink (i) used in the time period as determined from Reference Method 24, manufacturer's formulation data, or plant blending records, in kilograms per kilogram.

- c. The weighted average VOC content of the inks shall be calculated over a period that does not exceed one calendar month, or four consecutive weeks. A facility that uses an accounting system based on quarters consisting of two 28 calendar day periods and one 35 calendar day period may use an averaging period of 35 calendar days four times per year, provided the use of such an accounting system is documented in the initial performance test.

- d. Each determination of the weighted average VOC content shall constitute a performance test for any period when VOC emission control equipment is not used. Results of the initial performance test must be reported to the Administrator (the Akron RAQMD). Method 24 or ink manufacturers' formulation data along with plant blending records (if plant blending is done) may be used to determine VOC content. The Administrator (the Akron RAQMD) may require the use of Method 24 if there is a question concerning the accuracy of the ink manufacturer's data or plant blending records.

- e. If, during the time periods when emission control equipment is not used, all inks used contain less than 1.0 kilogram VOC per kilogram ink solids, the owner or operator is not required to calculate the weighted average VOC content, but must verify and record the VOC content of each ink (including any added dilution solvent) used as determined by Method 24, ink manufacturers' formulation data, or plant blending records.

[Authority for term: section 60.583(b) and section 60.581(b) of 40 CFR Part 60, Subpart FFF]

6. To demonstrate compliance with section 60.582(a)(1) of 40 CFR Part 60, Subpart FFF, the owner or operator may determine the weighted average VOC content using an inventory system.
- The inventory system shall accurately account to the nearest kilogram for the VOC content of all inks and dilution solvent used, recycled, and discarded for each affected facility during the averaging period. Separate records must be kept for each affected facility.
 - To determine VOC content of inks and dilution solvent used or recycled, Method 24 or ink manufacturers' formulation data must be used in combination with plant blending records (if plant blending is done) or inventory records or purchase records for new inks or dilution solvent.
 - For inks to be discarded, only Method 24 shall be used to determine the VOC content. Inks to be discarded may be combined prior to measurement of volume or weight and testing by Method 24.
 - The Administrator may require the use of Method 24 if there is a question concerning the accuracy of the ink manufacturer's data or plant records.
 - The Administrator shall approve the inventory system of accounting for VOC content prior to the initial performance test.
- [Authority for term: section 60.583(c) of 40 CFR Part 60, Subpart FFF]
7. The owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of section A.I.2.a of this permit shall maintain the records specified in sections A.III.7.a and A.III.7.b below for 5 years and submit them to the Administrator (the Akron RAQMD) upon request:
- the total mass of each material applied each month on the press, including all inboard and outboard stations; and
 - the total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.
- [Authority for term: section 63.829(f) of 40 CFR Part 63, Subpart KK]
8. Following the date on which the initial performance test of a control device is completed to demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device used to comply with section 63.3320 of 40 CFR Part 63, Subpart JJJJ. You must install and operate the monitoring equipment as specified in section A.III.10 of this permit.
- [Authority for term: section 63.3350(b) of 40 CFR Part 63, Subpart JJJJ]
9. If you are using a control device to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in section A.III.9.i below and section A.III.10 of this permit according to the requirements in sections A.III.9.a through A.III.9.h below.
- Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.
 - You must have valid data from at least 90 percent of the hours during which the process operated.
 - You must determine the hourly average of all recorded readings according to sections A.III.9.c.i and A.III.9.c.ii below.
 - To calculate a valid hourly value, you must have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.
 - Provided all of the readings recorded in accordance with section A.III.9.c above clearly demonstrate continuous compliance with the standard that applies to you, then you are not required to determine the hourly average of all recorded readings.
 - You must determine the rolling, 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, you must have at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).
 - You must record the results of each inspection, calibration, and validation check of the CPMS.
 - At all times, you must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), you must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in section A.V.7.e of this permit. You must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
 - Any averaging period for which you do not have valid monitoring data and such data are required constitutes a deviation, and you must notify the Administrator (the Akron RAQMD) in accordance with section A.IV.9 of this permit.

- i. If you are using an oxidizer to comply with the emission standards, you must comply with sections A.III.9.i.i through A.III.9.i.ii below.
- i. Install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment whether you choose not to perform the calibration or the equipment cannot be calibrated properly.
 - ii. For an oxidizer other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of plus or minus 1 percent of the temperature being monitored in degrees Celsius, or plus or minus 1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.
- [Authority for term: section 63.3350(e) of 40 CFR Part 63, Subpart JJJJ]
10. If you are complying with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ through the use of a capture system and control device for one or more web coating lines, you must develop a site-specific monitoring plan containing the information specified in sections A.III.10.a and A.III.10.b below for these capture systems. You must monitor the capture system in accordance with section A.III.10.c below. You must make the monitoring plan available for inspection by the permitting authority upon request.
- a. The monitoring plan must:
 - i. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained; and
 - ii. Explain why this parameter is appropriate for demonstrating ongoing compliance; and
 - iii. Identify the specific monitoring procedures.
 - b. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.
 - c. You must conduct all capture system monitoring in accordance with the plan.
 - d. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.
 - e. You must review and update the capture system monitoring plan at least annually.
- [Authority for term: section 63.3350(f) of 40 CFR Part 63, Subpart JJJJ]
11. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must maintain the records specified in sections A.III.11.a and A.III.11.b below on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1) (see Attachment 2):
- a. Records specified in 40 CFR 63.10(b)(2) (see Attachment 2) of all measurements needed to demonstrate compliance with this standard, including:
 - i. Control device and capture system operating parameter data in accordance with the requirements of sections A.III.9 and A.III.10 of this permit; and
 - ii. Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of sections A.V.5 and A.V.6 of this permit.
 - b. Records specified in 40 CFR 63.10(c) (see Attachment 2) for each CMS operated by the owner or operator in accordance with the requirements of section A.III.8 of this permit.
- [Authority for term: section 63.3410(a) of 40 CFR Part 63, Subpart JJJJ]
12. Operation of approved monitoring.
- a. Commencement of operation. The owner or operator shall conduct the monitoring required under 40 CFR Part 64 upon issuance of a Part 70 or 71 permit that includes such monitoring.
 - b. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - c. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
 - d. Response to excursions or exceedances.
 - i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the

pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

e. Documentation of need for improved monitoring. After approval of monitoring under 40 CFR Part 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: section 64.7 of 40 CFR Part 64]

13. Quality improvement plan (QIP) requirements.

a. Based on the results of a determination made under section A.III.12.d.ii of this permit, the Administrator or the permitting authority (the Akron RAQMD) may require the owner or operator to develop and implement a QIP. Consistent with section 64.6(c)(3) of 40 CFR Part 64, the Part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

b. Elements of a QIP:

i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

- (a) Improved preventive maintenance practices.
- (b) Process operation changes.
- (c) Appropriate improvements to control methods.
- (d) Other steps appropriate to correct control performance.
- (e) More frequent or improved monitoring (only in conjunction with one or more steps under sections A.III.13.b.ii.(a) through (d) above).

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to section A.III.12.d.ii of this permit the Administrator or the permitting authority (the Akron RAQMD) may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

- i. Failed to address the cause of the control device performance problems; or
- ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[Authority for term: section 64.8 of 40 CFR Part 64]

14. General record keeping requirements.

a. The owner or operator shall comply with the record keeping requirements specified in section 70.6(a)(3) (ii) of 40 CFR Part 70. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to section A.III.13 of this permit and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

- b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

[Authority for term: section 64.9(b) of 40 CFR Part 64]

15. The permittee shall operate and maintain a continuous data acquisition system to monitor the thermal incinerator combustion temperature. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test.

If there is any excursion of the average thermal incinerator combustion temperature during the quarter, the permittee shall develop a QIP as required in section A.III.13 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

16. The permittee shall operate and maintain a continuous data acquisition system to monitor the differential pressure across the enclosure. The chart recorder shall be calibrated annually in accordance with the manufacturer's recommendations.

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

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

b. all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column.

If there is any excursion of the average differential pressure across the enclosure during the quarter, the permittee shall develop a QIP as required in section A.III.13 of this permit.

[Authority for term: sections 64.3(a) and 64.3(c) of 40 CFR Part 64]

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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 incinerator, when the emissions unit was in operation, does not comply with the temperature limitation specified above.

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) and OAC rule 3745-31-05]

2. A summary report specified in section 63.10(e)(3) of 40 CFR Part 63, Subpart A shall be submitted on a semiannual basis (i.e., once every 6-month period). In addition to a report of operating parameter exceedances as required by section 63.10(e)(3)(i) of 40 CFR Part 63, Subpart A, the summary report shall include, exceedances of the criterion of section A.1.2.a of this permit.

[Authority for term: section 63.830(b)(6) of 40 CFR Part 63, Subpart KK]

3. For all affected facilities subject to compliance with section 60.582 of 40 CFR Part 60, Subpart FFF, the performance test data and results from the performance test shall be submitted to the Administrator (the Akron RAQMD) as specified in section 60.8(a) of 40 CFR Part 60, Subpart A.

[Authority for term: section 60.585(a) of 40 CFR Part 60, Subpart FFF]

4. The owner or operator of each affected facility shall submit semiannual reports to the Administrator (the Akron RAQMD) of occurrences of the following:

a. Exceedances of the weighted average VOC content specified in section 60.582(a)(1) of 40 CFR Part 60, Subpart FFF.

The reports required under this section shall be postmarked within 30 days following the end of the second and fourth calendar quarters.

[Authority for term: sections 60.585(b) and 60.585(c) of 40 CFR Part 60, Subpart FFF]

5. The requirements of section 60.585 of 40 CFR Part 60, Subpart FFF remain in force until and unless the Agency, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with section 60.585 of 40 CFR Part 60, Subpart FFF, provided that they comply with requirements established by the State.
[Authority for term: section 60.585(d) of 40 CFR Part 60, Subpart FFF]
6. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at either the required differential pressure or the required facial velocity through any of the natural draft openings specified above. These reports are due in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.
[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]
7. Each owner or operator of an affected source subject to 40 CFR Part 63, Subpart JJJJ must submit the reports specified in sections A.IV.8 through A.IV.13 of this permit to the Administrator (the Akron RAQMD).
[Authority for term: section 63.3400(a) of 40 CFR Part 63, Subpart JJJJ]
8. You must submit an initial notification as required by 40 CFR 63.9(b) (see Attachment 2).
 - a. Initial notification for existing affected sources must be submitted no later than 1 year before December 5, 2005.
 - b. Initial notification for new and reconstructed affected sources must be submitted as required by 40 CFR 63.9(b) (see Attachment 2).
 - c. For the purpose of 40 CFR Part 63, Subpart JJJJ, a Title V or Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b) (see Attachment 2), provided the same information is contained in the permit application as required by 40 CFR 63.9(b) (see Attachment 2) and the State to which the permit application has been submitted has an approved operating permit program under Part 70 of this chapter and has received delegation of authority from the EPA to implement and enforce 40 CFR Part 63, Subpart JJJJ.
 - d. If you are using a permit application in lieu of an initial notification in accordance with section A.IV.8.c above, the permit application must be submitted by the same due date specified for the initial notification.
[Authority for term: section 63.3400(b) of 40 CFR Part 63, Subpart JJJJ]
9. You must submit a semiannual compliance report according to sections A.IV.9.a and A.IV.9.b below.
 - a. Compliance report dates.
 - i. The first compliance report must cover the period beginning on December 5, 2005 and ending on December 31.
 - ii. The first compliance report must be postmarked or delivered no later than January 31.
 - iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - v. For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to section 70.6(a)(3)(iii)(A) of 40 CFR Part 70 or section 71.6(a)(3)(iii)(A) of 40 CFR Part 71, you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in sections A.IV.9.a.i through A.IV.9.a.iv above.
 - b. The compliance report must contain the information in sections A.IV.9.b.i through A.IV.9.b.v below:
 - i. Company name and address.
 - ii. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
 - iii. Date of report and beginning and ending dates of the reporting period.
 - iv. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
 - v. For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in 40 CFR Part 63, Subpart JJJJ, the compliance report must contain the information in sections A.IV.9.b.i through A.IV.9.b.iii above, and:
 - (a) The total operating time of each affected source during the reporting period.
 - (b) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.
 - (c) Information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

[Authority for term: section 63.3400(c) of 40 CFR Part 63, Subpart JJJJ]

10. You must submit a Notification of Performance Tests as specified in 40 CFR 63.7 and 63.9(e) (see Attachment 2) if you are complying with the emission standard using a control device and you are required to conduct a performance test of the control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) (see Attachment 2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless EPA objects to the parameter or requests changes, you may consider the parameter approved.

[Authority for term: section 63.3400(d) of 40 CFR Part 63, Subpart JJJJ]

11. You must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h) (see Attachment 2).

[Authority for term: section 63.3400(e) of 40 CFR Part 63, Subpart JJJJ]

12. You must submit performance test reports as specified in 40 CFR 63.10(d)(2) (see Attachment 2) if you are using a control device to comply with the emission standard and you have not obtained a waiver from the performance test requirement or you are not exempted from this requirement by section 63.3360(b) of 40 CFR Part 63, Subpart JJJJ. The performance test reports must be submitted as part of the notification of compliance status required in section A.IV.11 above.

[Authority for term: section 63.3400(f) of 40 CFR Part 63, Subpart JJJJ]

13. You must submit startup, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) (see Attachment 2), except that the provisions in Subpart A of 40 CFR Part 63 pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with 40 CFR Part 63, Subpart JJJJ.

a. If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by 40 CFR 63.6(e)(3) (see Attachment 2), the owner or operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to the Administrator (the Akron RAQMD).

b. Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in section 63.3400(c)(2)(vi) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: section 63.3400(g) of 40 CFR Part 63, Subpart JJJJ]

14. 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.

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

15. General reporting requirements.

a. On and after the date specified in section A.III.12.a of this permit by which the owner or operator must use monitoring that meets the requirements of 40 CFR Part 64, the owner or operator shall submit monitoring reports to the permitting authority in accordance with section 70.6(a)(3)(iii) of 40 CFR Part 70.

b. A report for monitoring under 40 CFR Part 64 shall include, at a minimum, the information required under section 70.6(a)(3)(iii) of 40 CFR Part 70 and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

iii. A description of the actions taken to implement a QIP during the reporting period as specified in section A.III.13 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

16. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature recorded during the most recent performance test. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

17. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average differential pressure across the enclosure, when the emissions unit was in operation, was less than or equal to 0.007 inch of water column. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: section 64.9(a) of 40 CFR Part 64]

18. The permittee shall notify the permitting authority (the Akron RAQMD) upon any establishment or

reestablishment of the thermal incinerator's average combustion temperature. The notification shall include the determination of the thermal incinerator's average combustion temperature value. The notification shall be submitted within 30 days following completion of the performance test(s). This notification may be included in the report required by section A.V.4 of this permit.

[Authority for term: section 64.6(c)(2) of 40 CFR Part 64]

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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 180 days of December 5, 2005 (see sections A.V.5 and A.V.6 below) and within 6 months prior to Title V permit expiration.

- b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.

- c. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- i. 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.)

- ii. 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 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.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

- e. The control device for emissions unit K007 is shared with emissions unit K001. During the testing, inlet concentration will be measured at a single point, as the summation of both emissions units.

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

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. 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 RAQMD's refusal to accept the results of the emission test(s).

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

3. Personnel from the Akron RAQMD 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.

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

4. 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 RAQMD 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 RAQMD.

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

5. You must complete any performance test required in sections A.V.5 and A.V.6 of this permit within the time limits specified in 40 CFR 63.7(a)(2). See Table 2 of 40 CFR Part 63, Subpart JJJJ in Attachment 2.

Control device efficiency. If you are using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ, you must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in sections A.V.5.a and A.V.5.b below. During the performance test, you must establish the operating limits required by section A.II.3 of this permit according to section A.V.5.c below.

- a. An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously, and the data are reduced in accordance with the test methods and procedures in sections A.V.5.a.i through A.V.5.a.ix below. You must conduct three test runs as specified in 40 CFR 63.7(e)(3) (see Attachment 2), and each test run must last at least 1 hour.

- i. Method 1 or 1A of 40 CFR Part 60, Appendix A, must be used for sample and velocity traverses to

determine sampling locations.

- ii. Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR Part 60, Appendix A, must be used to determine gas volumetric flow rate.
- iii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A, must be used for gas analysis to determine dry molecular weight. You may also use as an alternative to Method 3B the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas in ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus]," (incorporated by reference, see section 63.14 of 40 CFR Part 63, Subpart A).
- iv. Method 4 of 40 CFR Part 60, Appendix A, must be used to determine stack gas moisture.
- v. The gas volumetric flow rate, dry molecular weight, and stack gas moisture must be determined during each test run specified in section A.V.5.a.vii below.
- vi. Method 25 or 25A of 40 CFR Part 60, Appendix A, must be used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements which must be conducted simultaneously. You must submit notice of the intended test method to the Administrator for approval along with notification of the performance test required under 40 CFR 63.7(b) (see Attachment 2). You must use Method 25A if any of the conditions described in sections A.V.5.a.vi.(a) through A.V.5.a.vi.(d) below apply to the control device.
 - (a) The control device is not an oxidizer.
 - (b) The control device is an oxidizer but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart JJJJ; or
 - (c) The control device is an oxidizer but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or
 - (d) The control device is an oxidizer but because of the high efficiency of the control device the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

vii. Except as provided in 40 CFR 63.7(e)(3) (see Attachment 2), each performance test must consist of three separate runs with each run conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic compound concentrations and mass flow rates, the average of the results of all the runs will apply.

viii. Volatile organic matter mass flow rates must be determined for each run specified in section A.V.5.a.vii above using Equation 1 of this section:

$$Mf = [Qsd] \times [Cc] \times [12] \times [0.0416] \times [10^{-6}] \text{ Eq. 1}$$

where:

Mf = Total organic volatile matter mass flow rate, kilograms (kg)/hour (h);

Qsd = Volumetric flow rate of gases entering or exiting the control device, as determined according to section A.V.5.a.ii above, dry standard cubic meters (dscm)/h;

Cc = Concentration of organic compounds as carbon, ppmv;

12.0 = Molecular weight of carbon; and

0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m^3) (at 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

ix. For each run, emission control device destruction or removal efficiency must be determined using Equation 2 of this section:

$$E = [(Mfi - Mfo)/(Mfi)] \times 100 \text{ Eq. 2}$$

where:

E = Organic volatile matter control efficiency of the control device, percent;

Mfi = Organic volatile matter mass flow rate at the inlet to the control device, kg/h; and

Mfo = Organic volatile matter mass flow rate at the outlet of the control device, kg/h.

x. The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the test runs and calculated in Equation 2 of this section.

b. You must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of startup, shutdown, and malfunction will not constitute representative conditions for the purpose of a performance test.

c. Operating limits. If you are using one or more add-on control device other than a solvent recovery system for which you conduct a liquid-liquid material balance to comply with the emission standards in section 63.3320 of 40 CFR Part 63, Subpart

JJJJ, you must establish the applicable operating limits required by section A.II.3 of this permit. These operating limits apply to each add-on emission control device, and you must establish the operating limits during the performance test required by section A.V.5 above according to the requirements in section A.V.5.c.i below.

i. Thermal oxidizer. If your add-on control device is a thermal oxidizer, establish the operating limits according to sections A.V.5.c.i.(a) and A.V.5.c.i.(b) below.

- (a) During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.
- (b) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

[Authority for term: section 63.3360(e) of 40 CFR Part 63, Subpart JJJJ]

- 6. If you demonstrate compliance by meeting the requirements of sections 63.3370(e), (f), (g), (h), (i)(2), (k), (n) (2) or (3), or (p) of 40 CFR Part 63, Subpart JJJJ, you must determine capture efficiency using the procedures in section A.V.6.a below.
 - a. You may assume your capture efficiency equals 100 percent if your capture system is a permanent total enclosure (PTE). You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR Part 51, Appendix M, and that all exhaust gases from the enclosure are delivered to a control device.

[Authority for term: section 63.3360(f) of 40 CFR Part 63, Subpart JJJJ]

- 7. 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:

5 percent, by weight, materials applied on the press by the product and packaging rotogravure printing operations

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping of the total mass of each material applied on the press and on the press by the product and packaging rotogravure printing operations specified in section A.III.7 of this permit.

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

b. Emission Limitation:

1.0 kilogram VOC per kilogram ink solid

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the record keeping as required in sections A.III.5 and A.III.6 of this permit.

Methods in appendix A of 40 CFR Part 60, except as provided under section 60.8(b) of 40 CFR Part 60, Subpart A, shall be used to determine compliance with section 60.582(a) of 40 CFR Part 60, Subpart FFF as follows:

a. Method 24 for analysis of inks. If nonphotochemically reactive solvents are used in the inks, standard gas chromatographic techniques may be used to identify and quantify these solvents. The results of Method 24 may be adjusted to subtract these solvents from the measured VOC content.

[Authority for term: section 60.583(a)(1) of 40 CFR Part 60, Subpart FFF]

c. Emission Limitation:

2.5 lbs/hr of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the derived VOC emission factor of pound(s) of VOC per linear yard of material processed* by the maximum hourly production rate times (1 - 0.95**).

*The worst-case emission factor was developed per the "UV Coater Emissions Experiment" document dated May 11, 2004.

**Overall control efficiency required by OAC rule 3745-31-05(A)(3).

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

d. Emission Limitation:

12.0 tons of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the monthly record keeping specified in section A.III.1 of this permit.

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

e. Emission Limitation:

The permittee shall limit emissions to no more than 5 percent of the organic Hazardous Air Pollutants (HAP) applied for the month.

Applicable Compliance Method:

If you operate more than one capture system or more than one control device and only have always-controlled work stations, then you are in compliance with the emission standards in section 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ for the month if for each web coating line or group of web coating lines controlled by a common control device, the overall organic HAP control efficiency as determined by sections A.V.7.e.i through A.V.7.e.iv below for each web coating line or group of web coating lines served by that control device and a common capture system is at least 95 percent at an existing affected source.

i. Determine the oxidizer destruction efficiency using the procedure in section A.V.5 of this permit.

ii. Determine the capture system capture efficiency in accordance with section A.V.6 of this permit.

iii. Capture and control efficiency monitoring. Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with sections A.III.9 and A.III.10 of this permit to ensure capture and control efficiency.

iv. Control efficiency. Calculate the overall organic HAP control efficiency achieved using Equation 11 below:

$$R = [(E) \times (CE)]/100 \text{ Eq. 11}$$

where:

R = Overall organic HAP control efficiency, percent;

E = Organic volatile matter control efficiency of the control device, percent; and

CE = Organic volatile matter capture efficiency of the capture system, percent.

[Authority for term: sections 63.3320(c) and 63.3370(k)(1)(i) through (iii), (k)(2)(i), and (p) of 40 CFR Part 63, Subpart JJJJ]

f. Emission Limitation:

95% overall control efficiency for VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in sections A.V.1 through A.V.6 of this permit.

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

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VI. **Miscellaneous Requirements**

1. In delegating implementation and enforcement authority to a State under 40 CFR Part 63, Subpart E, the authorities contained in section A.VI.2 of this permit must be retained by the Administrator and not transferred to a State.

[Authority for term: section 63.3420(a) of 40 CFR Part 63, Subpart JJJJ]

2. Authority which will not be delegated to States: section 63.3360(c) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for organic HAP content determination; section 63.3360(d) of 40 CFR Part 63, Subpart JJJJ, approval of alternate test method for volatile matter determination.

[Authority for term: section 63.3420(b) of 40 CFR Part 63, Subpart JJJJ]

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Facility ID: 1667040015 Emissions Unit ID: K007 Issuance type: Title V Preliminary Proposed 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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Facility ID: 1667040015 Emissions Unit ID: P002 Issuance type: Title V Preliminary Proposed 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>
compounding room	OAC rule 3745-21-07(G)(2)	As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring.
	OAC rule 3745-21-07(G)(4)	If the mixing operation involves chemical manufacturing or a chemical reaction, then the permittee shall not discharge more than 8 pounds of organic compounds (OC) in any one hour into the atmosphere, nor more than 40 pounds of OC in any one day, when photochemically reactive materials, as defined under OAC rule 3745-21-01(C)(5), are employed. Emissions of OC to the atmosphere from the cleanup with photochemically reactive materials shall be included with the other emissions of OC from this emissions unit for determining compliance with this rule.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record of the following information for this emissions unit:
 - a. determination whether or not chemical manufacturing or a chemical reaction occurs for each mixture;
 - b. the MSDS sheets for each liquid organic raw material and cleanup material employed; and
 - c. documentation as to whether or not each liquid organic raw material and cleanup material is a photochemically reactive material, as defined by OAC rule 3745-21-01(C)(5).

[Authority for term: OAC rule 3745-77-07(C)(1)]
2. If it is determined that chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, then the permittee shall collect and record the following information for each day for this emissions unit:
 - a. whether or not chemical manufacturing or a chemical reaction occurs for each mixture;
 - b. the company identification for each raw material and cleanup material;
 - c. documentation of whether or not each raw material or cleanup material employed is a photochemically reactive material;
 - d. the amount of material mixed, in pounds;
 - e. the OC content of each photochemically reactive cleanup material employed, in pounds per gallon;
 - f. the number of gallon of each photochemically reactive cleanup material employed;
 - g. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the OC emission rate from the mixing operation, in pounds per day;
 - h. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the OC emission rate from all photochemically reactive cleanup materials employed (i.e., the sum of (e) times (f) for each photochemically reactive material employed);
 - i. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the total OC emission rate from all photochemically reactive cleanup material

employed and from the mixing operations, in pounds per day (i.e., (g) plus (h));
j. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and

k. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the average hourly OC emission rate from all photochemically reactive cleanup materials employed and from the mixing operation, in pounds per hour (i.e., (i)/(j)).

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

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which chemical manufacturing or a chemical reaction occurred and a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mixing operations and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. for the days during which chemical manufacturing or a chemical reaction occurred and a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mixing operations and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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

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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 method:
 - a. Emission Limitation:
 - 8 pounds of OC per hour
 - 40 pounds of OC per day
- Applicable Compliance Method:
- Compliance shall be demonstrated by the record keeping required in section A.III.2.

[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: 1667040015 Emissions Unit ID: P002 Issuance type: Title V Preliminary Proposed 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**

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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