State of Ohio Environmental Protection Agency

STREET ADDRESS:
Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

8/22/2008

Certified Mail
Facility ID: 0243001188
Permit Number: P0084872
County: Lake

Kevin Cherney
Marking Films Div. of Avery Dennison Building #11
670 Hardy Road
Building #11
Painsville, OH 44077

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Lake County News-Herald. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following:

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

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania

Lake County

PUBLIC NOTICE
ISSUANCE OF DRAFT AIR POLLUTION Title V Permit
Marking Films Div. of Avery Dennison Building #11

Issue Date: 8/22/2008
Permit Number: P0084872
Permit Type: Renewal
Permit Description: Title V PTO renewal for a coating line and printing operation
Facility ID: 0243001188
Facility Location: Marking Films Div. of Avery Dennison Building #11
670 Hardy Road, Building #11
Painsville, OH 44077
Facility Description: Coated and Laminated Paper Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control Title V operating permit for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Nancy Meli at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: www.epa.state.oh.us/dapc

Statement of Basis For Title V Permit

Part I - General	
Company Name	Avery Dennison Graphics and Reflective Products
Premise Number	02 43 00 1188

What makes this facility a Title V facility?	Major for HAPs and VOCs
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any “common control” issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	K002-coating line 2-PTI #02-7592 K003-coating line 3-PTI #02-9533 K004-coating line 4-PTI #02-21880
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	(1) Moved DeMinimis insignificant units to State Only Enforceable section Part II.B.; (2) Included new language in the State and Federally Enforceable section Part II.A; (3) Sited regulatory authority for all terms in the entire permit.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	

X **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		N	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K002	2.6 lbs of VOC per gallon of coating minus H2O & exempt solvent	31-05(A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	

K002 & K003	0.2kg VOC/kg of coating solids, applied	N	40 CFR Part 60 subpart RR	N	N	Y	N	N	Y	N	Y	N	Y	N	
K002	39 tons per year VOC	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
K002	8.9 lbs/hr VOC;	31-05(A)(3)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
K002	0.10 lb/hr O3 and 0.44 tpy	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	Y	N	O3 emissions are determined by manufacturer's internal stack tests and by the maximum Kw power capacity of the corona treaters; currently no SIP rule for O3
K002 K003	1.5 lbs/hr NOx; 1.4 lbs/hr NOx, 6.2 tpy	31-05(A)(3)	N	N	Y	N	N	N	N	N	N	N	Y	N	NOX emissions are based on AP 42 emission factors and maximum heating capacity of the ovens; mitigated by low NOx burners
K003	1.2 lbs/hr CO; 5.2 tpy	31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	Y	N	CO emissions are based on AP 42 emission factors and maximum heating capacity of the ovens; currently no SIP rule limit for CO

K001	HAPs	N	40 CFR Part 63 Subpart KK	n	n	y	n	n	y	n	y	n	n	n	Exempt The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the printing process using product and packaging rotogravure work stations in each month shall never exceed five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by this emissions unit in that month, including all inboard and outboard stations. The permittee has chosen to exclude this emissions unit, which is used primarily for coating, laminating, or other operations, from the 40 CFR Part 63, subpart KK, Printing and Publishing MACT requirements.
K002 K003	98% overall reduction 98.3% overall reduction	N	40 CFR Part 63 Subpart JJJJ	n	n	y	n	n	y	n	y	n	y	n	

K002-4			40 CFR Part 63 Subpart DDDDD												General : Boiler MACT for all Boilers and Heaters which may be used for process heat have no applicable requirements because all are in the small gaseous fuel categories.

EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

X **Instructions for Part III:**

X All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

X If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.

1. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

X **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Title V Permit

for

Marking Films Div. of Avery Dennison Building #11

Facility ID: 0243001188
Permit Number: P0084872
Permit Type: Renewal
Issued: 8/22/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Title V Permit

for

Marking Films Div. of Avery Dennison Building #11

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Authorization

Facility ID: 0243001188
Facility Description: Pressure sensitive tape and film manufacturer
Application Number(s): A0015460, A0015461, A0015462
Permit Number: P0084872
Permit Description: Title V PTO renewal for a coating line and printing operation
Permit Type: Renewal
Issue Date: 8/22/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Marking Films Div. of Avery Dennison Building #11
670 Hardy Road
Building #11
Painsville, OH 44077

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

A. Standard Terms and Conditions

1. **Federally Enforceable Standard Terms and Conditions**

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northeast District Office.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

   (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

   (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the

Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to

meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) B.7, B.8

2. 40 CFR Part 63, Subpart JJJJ MACT Requirements

   Emissions units (OEPA unit numbers K002, K003) because of the potential to emit of HAPS from this facility, are subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart JJJJ, in accordance with 40 CFR Parts 63.3280 through 63.3410 (including the Table(s) and Appendix(ices) referenced in Subpart JJJJ), which are included in the text of the final standard, promulgated on December 14, 2002, and are hereby incorporated into this permit as if fully rewritten.

3. 40 CFR Part 63, Subpart KK, the Printing MACT Requirements

   The F3 adhesive coating line (OEPA emissions unit number K003) and the Banner Line (OEPA emissions unit number K004), because of the potential to emit of HAPS from this facility, is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart KK, in accordance with 40 CFR Parts 63.820 through 63.830 (including the Table(s) and Appendix(ices) referenced in Subpart KK), which are included in the text of the final standard, promulgated on May 30, 1996, and are hereby incorporated into this permit as if fully rewritten.

4. 40 CFR Part 63,Subpart OOOO, the Fabric Coating MACT Requirements

   The Banner Line, (OEPA emissions unit number K004) because of the potential to emit of HAPS from this facility, is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart OOOO, in accordance with 40 CFR Parts 63.4280 through 63.4371 (including the Table(s) and Appendix(ices) referenced in Subpart OOOO), which are included in the text of the final standard, promulgated on May 29, 2003, and are hereby incorporated into this permit as if fully rewritten.

5. 40 CFR Part 63,Subpart EEEE, the Organic Liquids Distribution (Non-Gasoline) MACT Requirements

   As of the date of the final issuance of this permit, Avery is an existing source and is subject to this MACT because:

   a) Avery has equipment (storage tanks, containers, transfer racks, and piping systems, as defined in Table II of Subpart EEEE) containing organic liquids; (organic liquids, are defined in the MACT as liquids containing 5%,by weight, of any orgainic HAP); and

   b) is a major source for HAPs.

   However, because none of the equipment that is subject to this MACT have the organic liquid capacity as described in the MACT, the facility is exempted from the requirements of the MACT.

6. Notification Requirement

   In the event that Avery does install equipment, as defined in EEEE Part 63 40 CFR, then Avery is no longer exempted from the requirements of the MACT and notification of the intended installation shall be made to the Northeast District of the Ohio EPA, so that appropriate record keeping and reporting can be defined and permitting action taken.

7. 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:

   P005-670-1 25-HP Compounding Mixer;

   P006-670-5 50-HP Compounding Mixer (non solvent based coatings);

   Z003-670-2B Solvent Wash Tank (F-2)(One of six wash tanks included in OEPA Permit ID:L001);

   Z004-670-4 Solvent Wash Tank (Cmp. Rm.)(One of six wash tanks included in OEPA Permit ID:L001);

   Z005-670-3 Solvent Wash Tank (F3)(One of six wash tanks included in OEPA Permit ID:L001);

   Z006-670-2A Solvent Wash Tank (F-2)(One of six wash tanks included in OEPA Permit ID:L001);

   Z011-Solvent Cleaner;

   Z012-670-2 25HP Adhesive;

   Z013-670-1 10-HP Adhesive Mixer(One of two mixers included in OEPA Permit ID: P002);

   Z015-670-1 Welding Station;

   Z016-Water based wash tank (F-3 Coater) Adhesive delivery system;

   Z017-Solvent Wash Tank (F-3 Coater) Adhesive delivery system;

   Z018-Five (5) 1-HP Bench top mixers (Color Lab); and

   Z019-UL Burn Booth.

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

8. The following emissions units have been permanently shutdown as of the most recent submittal date of the renewal Title V permit application:

   P001-Churn cleaner;

   P003-670-1 Versator Cleaning;

   P007-670-3 10-HP Compounding Mixer;

   Z001-670-1B Solvent Wash Tank (F-1)(One of six wash tanks included in OEPA Permit ID:L001);

Z002-670-1A Solvent Wash Tank (F-1)(One of six wash tanks included in OEPA Permit ID:L001);

Z007-670-5 Solvent Wash Tank;

Z008-670-6 Solvent Wash Tank;

Z009-670-7 Solvent Wash Tank;

Z010-670-8 Solvent Wash Tank; and

Z014-670-1 Vorta Siv.

C. Emissions Unit Terms and Conditions

1. **K002, F-2 Coater**

Operations, Property and/or Equipment Description:

F-2 Coater - Adhesive Coating Line (K002) & F-2 Corona Treater

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(F)	For the coatings that are vented to the RTO (solvent based coatings), the emission limitations specified by this rule are less stringent than the emission limitations specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1) and the emission limitations established pursuant to OAC rule 3745-31-05. For the coatings that are not vented to the RTO (non-solvent based coatings), the VOC content limitation specified in this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05.
b.	OAC rule 3745-31-05 (PTI 02-7592)	0.1 pound per hour and 0.44 ton per year of ozone
c.	OAC rule 3745-31-05 (PTI 02-6981)	8.90 pounds VOC per hour, including cleanup, as a daily average 39.0 tons VOC per year, including cleanup 98.0% overall VOC reduction by weight (with a 100% capture efficiency and at least a 98.0% destruction

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		efficiency) for all solvent based coatings (see b)(2)b) For all coatings that are not vented to the thermal oxidizer (non-solvent based coatings), the VOC content of the coatings employed shall not exceed 2.6 pounds per gallon, excluding water and exempt solvents. The requirements of this rule also include compliance with the VOC content limitation specified in 40 CFR Part 60, Subpart RR.
d.	40 CFR Part 60, Subpart RR	The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3). For the coatings that are not vented to the RTO (non-solvent based coatings), the VOC content of the coatings employed shall not exceed 0.20 kg VOC/kg of coating solids (see b)(2)c)
e.	40 CFR Part 63, Subpart JJJJ	See e)(7).
f.	40 CFR Part 63, Subpart B, Case by Case MACT and OAC rule 3745-31-28	See b)(2)d and b)(2)e.

(2) Additional Terms and Conditions

a. The permittee shall install and maintain a permanent total enclosure, that complies with the requirements of 40 CFR 60, Reference Method 204, to capture all VOC emissions from this emissions unit.

b. A solvent based coating is any coating that has a VOC content greater than 0.20 kg VOC per kg coating solids or 2.6 pounds per gallon, as applied, whichever is more stringent and is vented to the RTO.

c. A non-solvent based coating is any coating that has a VOC content less than or equal to 0.20 kg VOC per kg coating solids, as applied.

d. The natural gas fuel fired oven burners/heaters for process heat associated with this emissions unit are small gaseous fuel fired process heaters with heat input ratings below 10 mmBtu/hr.

e. These burners/heaters were originally affected sources with no applicable requirements, subject to 40 CFR Part 63, Subpart DDDDD " Boiler MACT ", until this rule was vacated on July 30, 2007. On this date, the burners/heaters became subject to 40 CFR Part 63, Subpart B "Case by Case MACT " . The permittee has chosen to continue to comply with Subpart DDDDD requirements in lieu of creating and submitting an alternative specific regulation for the heaters.

c) Operational Restrictions

(1) The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the average temperature during the most recent emission test that demonstrated that the emission unit was in compliance with this permit and Subpart JJJJ of 40 CFR Part 63.

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

(2) This emissions unit shall be totally enclosed such that all VOC emissions are captured. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Director or Administrator.

b. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

c. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm); the corresponding pressure drop shall be at least 0.007 inches of water as described in Method 204. The direction of air flow through all NDO's shall be into the enclosure.

d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

e. All VOC emissions, except those resulting from non-solvent based coatings, must be captured and vented to the RTO as described in Method 204.

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

(3) When this emissions unit is in operation, the PTE shall be maintained under negative pressure at a minimum differential pressure of .007 inches of water as a three-hour average unless it is equal to or greater than the differential pressure that was established at the time of the last emissions test that demonstrated compliance with the criteria for the permanent total enclosure. The corresponding differential pressure was

determined for the PTE when compliance with the 200 fpm facial velocity was demonstrated.

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

(4) The emissions unit shall be vented to the RTO during all solvent based coating operations and shall not vent through any bypass stack, except when employing non-solvent based coatings.

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

(5) The permittee shall properly maintain and operate the LEL units in the bypass stack, and any other device or means to ensure that emissions from solvent based coatings do not go directly to the ambient air.

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

(6) During the required use of the RTO, the permittee shall ensure that any inline bypass that could divert solvent laden air from any coating applicator to the ambient air is closed.

In addition, any device in the bypass which indicates a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

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

(7) The RTO control system shall be designed and operated according to good engineering practices and the manufacturer's specifications.

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

(8) The concentrations of VOC emissions measured in accordance with the leak monitoring program for the permanent total enclosure shall not exceed 100 ppm, by volume.

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

(9) Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR 63.3330, the affected source must comply with the following operating limit:

The average combustion temperature within the thermal oxidizer serving this emissions unit (thermal oxidizer 3) in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3360(e)(3)(i).

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60 Subpart JJJJ]

(10) Pursuant to 40 CFR 63.6(e), the owner or operator of an affected source must develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; a program of corrective action for malfunctioning process; and air pollution control and monitoring equipment used to comply with the relevant standard. This plan must be developed by the owner or operator by the source's

compliance date for that relevant standard. The purpose of the startup, shutdown, and malfunction plan is listed below:

a. ensure that, at all times, the owner or operator operate and maintain affected sources, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by the relevant standards;

b. ensure that owners or operators are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants; and

c. reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperatures within the RTO 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 each day:

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was below the average temperature during the most recent emission test that demonstrated that the emission unit was in compliance with this permit and Subpart JJJJ of 40 CFR Part 63;

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

c. a record of all periods of time during which solvent based coatings were employed, but the VOC emissions were not vented to the RTO.

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

(2) The permittee shall operate and maintain, a continuous pressure drop monitor and recorder which measures and records the pressure drop across the total enclosure when the permittee is employing solvent based coatings in this emissions unit. Units shall be in inches of water. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The pressure drop 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 each day:

a. all three hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential, in inches of water as a three-hour average, specified in c)(3); and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

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

(3) The permittee shall collect and record the following information monthly for all non-solvent based coatings employed in this emissions unit:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in kg/kg of coating solids, as applied;

c. the weight fraction of VOC in each coating;

d. the weight fraction of solids in each coating;

e. the total mass of each coating, in kgs; and

f. the mass-weighted average VOC content for all the coatings employed, in kg/kg of coating solids, calculated in accordance with the equation in section 60.443(a)(2) of Subpart RR.

If the VOC content of each coating employed during the calendar month does not exceed 0.20 kg of VOC/kg of solids, the permittee has demonstrated compliance with the VOC content limitation for that month and is not required to calculate the mass-weighted VOC content for all the coatings employed during the calendar month.

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

(4) The permittee shall collect and record the following information daily for all the coatings employed in this emissions unit that are vented to the RTO and the cleanup materials associated with these coatings:

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

b. the VOC content of each coating, excluding water and exempt solvents, as applied, in pounds per gallon;

c. the number of gallons of each coating employed, excluding water and exempt solvents;

d. the name and identification 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 total uncontrolled VOC emissions from all coatings, in tons;

h. the total uncontrolled VOC emissions from all cleanup materials, in tons;

i. the calculated, controlled VOC emission rate for all coatings, in tons (the controlled VOC emission rate for the coatings 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); and

j. the total VOC emission rate, i.e., controlled VOC emissions from all coatings plus uncontrolled emissions from all cleanup materials, in tons.

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

(5) The permittee shall collect and record the following information daily for all the non-solvent based coatings and associated cleanup materials employed in this emissions unit:

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

b. the VOC content of each coating, excluding water and exempt solvents, as applied, in pounds per gallon;

c. the number of gallons of each coating employed, excluding water and exempt solvents;

d. the name and identification 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 total VOC emissions from all coatings employed, in tons, and from all coatings and cleanup materials employed, in tons; and

h. the daily volume-weighted average VOC content, in lbs per gallon of all the coatings employed, excluding water and exempt solvents, calculated in accordance with the equation in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

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

(6) The permittee shall record the following information daily:

a. the total daily VOC emissions from this emissions unit, i.e., the sum of the values from d)(4)j and d)(5)g (for all coatings and all cleanup materials);

b. the total operating hours of the coating line; and

c. the average hourly VOC emission rate, in pounds/hr.

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

(7) The permittee shall collect and record monthly the following information for all coatings and all cleanup materials employed in this emissions unit:

a. the cumulative monthly sum of the daily values from d)(6)a; and

b. the cumulative, year-to-date, VOC emissions for the calendar year, in tons.

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

(8) The permittee shall inspect and monitor at least quarterly with a Photoionization Detector or equivalent device all positive pressure locations between the permanent total enclosure of the coater and the RTO for unacceptable VOC emission levels (greater than 100 ppm) and maintain records of the results in accordance with the permittee's 1998 preventive maintenance plan or equivalent. Records shall be maintained of the inspection results and shall include the following:

a. line speed;

b. fan speed (frequency is measured in hertz, an indirect measure of fan speed);

c. VOC content of the coating applied at the time of monitoring;

d. an indication of any unacceptable level of VOCs; and

e. any corrective actions taken in response to any detected leaks.

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

(9) The permittee shall maintain records of the maintenance and operation of the LEL units, or any other device or means approved by the Ohio EPA, which ensure that the emissions from solvent based coatings do not go directly to the ambient air, and these records shall be made available to the Director or his representative upon request during normal business hours.

The permittee shall record the date and duration of each period of bypassing while employing solvent based coatings.

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

(10) Any device in the bypass that monitors a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

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

(11) Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

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

(12) On and after the compliance date specified in 40 CFR Section 63.3330, each owner or operator of an affected source subject to 40 CFR 63.3320 must maintain the records specified in paragraphs (a)(1) and (2) of 40 CFR 63.3410 on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1):

a. Records specified in Sec. 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, including if applicable:

i. continuous emission monitor data in accordance with the requirements of Sec. 63.3350(d);

ii. control device and capture system operating parameter data in accordance with the requirements of Sec. 63.3350(c), (e), and (f);

iii. organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(c);

iv. volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(d);

v. overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of Sec. 63.3360(e) and (f); and

vi. material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of Sec. 63.3370(b), (c), and (d).

b. Records specified in Sec. 63.10(c) for each CMS operated by the owner or operator in accordance with the requirements of Sec. 63.3350(b).

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

(13) Pursuant to 40 CFR 63.3350(c) and upon the compliance date, web coating lines with intermittently-controlled work stations shall be monitored for bypasses of the control device and the mass of each coating material applied at the work station during any such bypass. If using a control device for complying with the requirements of this subpart, you must demonstrate that any coating material applied on a never- controlled work station or an intermittently-controlled work station operated in bypass mode is allowed in your compliance demonstration according to Sec. 63.3370(n) and (o). The bypass monitoring must be conducted using at least one of the procedures in paragraphs (c)(1) through (4) of 40 CFR 63.3350(c) for each work station and associated dryer. The procedures are the following:

a. flow control position indicator;

b. car-seal or lock-and-key valve closures;

c. valve closure continuous monitoring; and

d. automatic shutdown system.

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

(14) When using a control device to comply with the emission standards in 40 CFR 63.3320, the permittee shall install, operate, and maintain each CPMS specified in paragraphs (e)(9) and (10) and (f) of 40 CFR 63.3350 according to the requirements in paragraphs (e)(1) through (8) of 40 CFR 63.3350. You must install, operate, and maintain each CPMS specified in paragraph (c) of 40 CFR 63.3350 according to paragraphs (e)(5) through (7) of 40 CFR 63.3350. Paragraphs (e)(1) through (e)(8) are listed below as terms (a) through (h):

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

b. The permittee shall have valid data from at least 90 percent of the hours during which the process operated.

c. The permittee shall determine the hourly average of all recorded readings according to paragraphs (16)(c)(i) and (ii) of 40 CFR Section 63.3350.

i. To calculate a valid hourly value, the permittee 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 paragraph (e)(3) of 40 CFR Section 63.3350 clearly demonstrate continuous compliance with the standard that applies, then the permittee is not required to determine the hourly average of all recorded readings.

d. The permittee shall determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, 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. The permittee shall record the results of each inspection, calibration, and validation check of the CPMS.

f. At all times, the permittee shall 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), the permittee shall 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 Sec. 63.3370. All the valid data collected during all other periods in assessing compliance of the control device and associated control system shall be used. 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 the permittee does not have valid monitoring data and such data is required constitutes a deviation, and you must notify the Administrator in accordance with Sec. 63.3400(c).

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

e) Reporting Requirements

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified above; and

b. all periods when the stack that bypasses the RTO was used while employing solvent based coatings in the emissions unit.

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

(2) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any monthly record showing that the mass-weighted average VOC content for the non-solvent based coatings exceeded the applicable limitation of 0.20 kg of VOC per kg of coating solids, as applied.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 45 days after the exceedance(s) occurred.

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

(3) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the volume-weighted average VOC content for the non-solvent based coatings exceeded the applicable limitation of 2.6 pounds per gallon, excluding water and exempt solvents.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 45 days after the exceedance(s) occurred.

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

(4) The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time, when the emissions unit was in solvent based operation, during which the permanent total enclosure was not maintained at the minimum pressure differential required in c)(3).

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

(5) The permittee shall submit deviation (excursion) reports that identify each day during which the average hourly VOC emissions exceeded 8.90 pounds per hour, and the actual average hourly VOC emissions for each such day.

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

(6) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year.

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

(7) Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR Part 63, Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

a. the methods used to determine compliance;

b. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63, Subpart JJJJ;

e. an analysis demonstrating whether the affected source is a major source or an area source;

f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

g. a statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63, Subpart JJJJ.

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

(8) The permittee shall submit quarterly deviation reports that identify all exceedances of the 100 ppm, by volume, VOC concentration limitation specified in c)(8).

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

(9) Pursuant to 40 CFR 63.3400(c) and upon the compliance date in 40 CFR Part 63.3330, the permittee shall submit a semiannual compliance report according to paragraphs (c)(1) and (2) of 40 CFR 63.3400.

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

f) Testing Requirements

(1) USEPA Method 24 shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine VOC content for all coatings. VOC content from data sheets, resulting from the use of Method 24 may also be used. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the cleanup materials.

If pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of experimental coatings if the amount of a specific formulation of an experimental coating used is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24.

The amount of experimental coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

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

(2) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

98% overall reduction by weight (with a 100% capture efficiency and a minimum 98% destruction efficiency) for all coatings except non-solvent based coatings

Applicable Compliance Method:

Performance testing shall be conducted within 6 months prior to permit expiration using the following methods:

40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M, Method 204.

Performance testing shall be in accordance with OAC rule 3745-21-10(C).

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-15-04(A)]

b. Emission Limitation:

0.20 kilogram of VOC per kilogram of solids, as applied, when employing non-solvent based coatings

Applicable Compliance Method:

Compliance shall be based upon the use of Method 24, or any alternative compliance method approved by the USEPA for determining the VOC content of each coating, and on the record keeping requirements in d)(3).

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

c. Emission Limitation:

2.6 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents when employing non-solvent based coatings

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in d)(5).

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

d. Emission Limitation:

8.90 lbs VOC/hr on a daily average basis

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in d)(4), d)(5) and d)(6).

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

e. Emission Limitation:

39.0 tons VOC per year

Applicable Compliance Method:

Compliance shall be determined by the sum of the values for the calendar year based on the record keeping requirements in d)(3), d)(4), d)(5) and d)(6).

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

f. Emission Limitation:

0.1 lb/hr ozone

Applicable Compliance Method:

Compliance shall be based on the following equation:

E = (0.014 lb ozone/kW) x (maximum kW of input power for the corona treater)

where:

E = maximum lbs ozone emitted per hour

0.014 lb of ozone per kW is emission factor developed from emissions testing.

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

g. Emission Limitation:

0.44 ton per year ozone

Applicable Compliance Method:

Multiply the allowable hourly emission rate by the actual hours of operation per year, and divide by 2000 (lbs/ton).

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

(3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration or as otherwise required by Ohio EPA.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation and capture efficiency limitation for VOC of 98% and 100%, respectively.

c. The following test methods shall be employed to demonstrate compliance with the overall control efficiency for VOC:

i. Method 25 of 40 CFR, Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

ii. Method 25A of 40 CFR, Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and

iii. Method 204 of 40 CFR Part 51, Appendix M.

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

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

e. The capture efficiency shall be determined using Methods 204 through Method 204F, as specified 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request for the use of an alternative method, including an evaluation of the applicability, neccessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)

f. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10. 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.

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA and local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

h. Personnel from the to the Northeast District Office of the Ohio EPA and local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. 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 to the Northeast District Office of the Ohio EPA 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 to the Northeast District Office of the Ohio EPA .

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

g) Miscellaneous Requirements

(1) The permittee shall employ the plan for preventive maintenance and repair of leaks, or a modification thereof, within the solvent capture and destruction system as submitted to the Ohio EPA on August 10, 1998.

(2) Equipment subject to the plan shall include all positive pressure ductwork from the enclosures of the heads of the coaters to the thermal oxidizer, the ovens and the thermal oxidizer fan cover.

[Authority for term: PTI 02-7592]

2. **K003, F-3 Coater**

Operations, Property and/or Equipment Description:

F-3 Coater - Adhesive Coating Line (K003), F-3 Corona Treater, 30-HP Boiler, Chilled Water System, Print Station, solvent and emulsion Adhesive coating and silicon-based coating stations.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(F) and OAC rule 3745-21-09(B)	For the coatings that are vented to the RTO (solvent based coatings), the control requirements specified by this rule are less stringent than the control requirements specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1) and the requirements established pursuant to OAC rule 3745-31-05. For the coatings that are not vented to the RTO (non-solvent based coatings), the VOC content limitation specified in this rule is less stringent than the VOC content limitation established pursuant to 40 CFR Part 60, Subpart RR.
b.	OAC rule 3745-31-05(A)(3) (PTI 02-17482 as modified on February 3, 2004)	22.03 pounds VOC per hour from the coating line, including cleanup, as a daily average (0.3 pound per hour from the print station, including cleanup) 95.33 tons VOC per year from both the coating line and the printing station, including cleanup

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		98.3% overall VOC reduction by weight (with a 100% capture efficiency and at least a 98.3% destruction efficiency) for all solvent based coatings See b)(2)a, b)(2)b and b)(2)c. The requirements of this rule also include compliance with 40 CFR Part 60, Subpart RR, for the adhesive coating operation and OAC rule 3745-21-09(Y)(1) for the print station. The requirements of this rule also include compliance with the VOC content limitation specified in 40 CFR Part 60, Subpart RR.
c.	40 CFR Part 60, Subpart RR	The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3). For the coatings that are not vented to the RTO (non-solvent based coatings), the VOC content of the coatings employed shall not exceed 0.20 kg VOC/kg of coating solids. See b)(2)b.
d.	40 CFR Part 63, Subpart JJJJ	See b)(2)d and e)(6).
e.	40 CFR Part 63, Subpart B, Case by Case MACT and OAC rule 3745-31-28	See b)(2)f.
f.	OAC rule 3745-21-09(Y)(1)	For all coatings and inks, employed in the printing station of this emissions unit, the volatile organic compound content limit specified by this rule is less stringent than the limitation established pursuant to 40 CFR Part 60, Subpart RR.
g.	40 CFR Part 63, Subpart KK (National Emission Standards for	Exempt by 40 CFR 63.821(a)(2)(ii)(A).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	the Printing and Publishing Industry)	See c)(9).

(2) Additional Terms and Conditions

a. The permanent total enclosure for this emissions unit, shall comply with the requirements of 40 CFR Part 51, Appendix M, Reference Method 204, to capture all VOC emissions from the adhesive coater.

b. All solvent based coatings from the adhesive coating operation must be vented to the thermal oxidizer. A solvent based coating is any coating that is vented to the RTO. Any coating with a VOC content greater than 0.2 kgVOC per kg coating solids or 2.9 lbs per gallon, whichever is more stringent, as applied shall be vented to the thermal oxidizer.

All inks and coatings employed in the print station of this emissions unit shall be "non solvent based coatings", i.e, they shall have a VOC content less than or equal to 0.2 kg VOC per kg of coating solids, as applied and are vented the thermal oxidizer.

c. For the adhesive coatings that are vented to the thermal oxidizer in lieu of complying with the pounds of VOC per gallon of solids limitation contained in OAC rule 3745-21-09(F), the permittee shall comply with the capture and control requirements, defined in this permit, which are more stringent than those required by OAC rule 3745-21-09(B)(6), and are established as BAT by OAC rule 3745-31-05(A)(3) above.

d. Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR 63.3330, the source must limit HAP emissions from the affected source to:

i. no more than 5 percent of the organic HAP applied for each month (95 percent reduction); or

ii. no more than 4 percent of the mass of coating materials applied for each month; or

iii. no more than 20 percent of the mass of coating solids applied for each month.

The permittee shall operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 ppmv by compound on a dry basis is achieved and the efficiency of the capture system is 100 percent.

e. The natural gas fuel fired oven burners/heaters for process heat associated with this emissions unit are small gaseous fuel fired process heaters with heat input ratings below 10 mmBtu/hr.

These burners/heaters were originally affected sources with no applicable requirements, subject to 40 CFR Part 63, Subpart DDDDD " Boiler MACT ", until

this rule was vacated on July 30, 2007. On this date, the burners/heaters became subject to 40 CFR Part 63, Subpart B "Case by Case MACT " . The permittee has chosen to continue to comply with Subpart DDDDD requirements in lieu of creating and submitting an alternative specific regulation for the heaters.

c) Operational Restrictions

(1) When employing solvent based coatings, the average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the average temperature during the most recent emission test that demonstrated that the emission unit was in compliance with this permit and Subpart JJJJ of 40 CFR Part 63.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-17482 (2/3/2004)]

(2) When employing solvent based coatings, the adhesive coating line shall be totally enclosed such that all the VOC emissions are captured. Compliance with the following criteria for a Permanent Total Enclosure (PTE), identified by USEPA Method 204, shall be met by the permittee to demonstrate 100 % capture efficiency (CE):

a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Director or Administrator.

b. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

c. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.

d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

e. All VOC emissions from the adhesive coating operation, except those resulting from non-solvent based coatings, must be captured and vented to the thermal oxidizer.

(3) When this emissions unit is in operation and employing solvent based coatings, the PTE shall be maintained under negative pressure at a minimum differential pressure of 0.007 inch of water, or a comparable total enclosure pararmeter, approved by Ohio EPA as a 3-hour average.

However, if the differential pressure, as a three-hour average, corresponding to the 200 fpm facial velocity that was established at the time of the last emissions test that demonstrated compliance with the criteria for the permanent total enclosure is greater than 0.007 inch of water, as a 3-hour average (more stringent), then that differential pressure shall be used.

[Authority for Term: OAC rule 3745-77-07(A)(1)and PTI 02-17482 (2/3/2004)]

(4) This emissions unit shall be vented to the RTO during all solvent based coating operations and shall not vent through any bypass stack except when employing non-solvent based coatings.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-17482 (2/3/2004)]

(5) The permittee shall properly maintain and operate the LEL units in the bypass stack of the RTO, and any other device or means to ensure that emissions from solvent based coatings do not go directly to the ambient air.

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-17482 (2/3/2004)]

(6) During the required use of the RTO, the permittee shall ensure that any inline bypass that could divert solvent laden air from any coating applicator to the ambient air is closed.

In addition, any device in the bypass which indicates a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

[Authority for Term: OAC rule 3745-77-07(A)(1)and PTI 02-17482 (2/3/2004)]

(7) The RTO control system shall be designed and operated according to good engineering practices and the manufacturer's specifications.

[Authority for Term: OAC rule 3745-77-07(A)(1)and PTI 02-17482 (2/3/2004)]

(8) The concentrations of VOC emissions measured in accordance with the leak monitoring program for the permanent total enclosure shall not exceed 100 ppm, by volume.

[Authority for Term: OAC rule 3745-77-07(A)(1)and PTI 02-17482 (2/3/2004)]

(9) The permittee shall operate this emissions unit such that during each month the sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the printing operation using product and packaging rotogravure work stations or wide web flexographic presses, never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied at all coating stations in the emissions unit in that month, including all inboard and outboard stations, as described in Section 63.821(A).

In the event that the percentage of the total mass as described above is in excess of 5%, this coating line shall no longer be exempted from 40 CFR Part 63, Subpart KK.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004]

(10) Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR 63.3330, the affected source must comply with the following operating limit:

The average combustion temperature within the thermal oxidizer serving this emissions unit (thermal oxidizer 3) in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3360(e)(3)(i).

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 60 Subpart JJJJ]

(11) Pursuant to 40 CFR 63.6(e), the owner or operator of an affected source must develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; a program of corrective action for malfunctioning process; and air pollution control and monitoring equipment used to comply with the relevant standard. This plan must be developed by the owner or operator by the source's compliance date for that relevant standard. The purpose of the startup, shutdown, and malfunction plan is listed below:

a. ensure that, at all times, the owner or operator operate and maintain affected sources, including associated air pollution control and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by the relevant standards;

b. ensure that owners or operators are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants; and

c. reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

[Authority for Term: OAC rule 3745-77-07(A)(1) and PTI 02-17482 (2/3/2004)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperatures within the RTO 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 each day:

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was below the average temperature during the most recent emission test that demonstrated that the emission unit was in compliance with this permit and Subpart JJJJ of 40 CFR Part 63;

b. a log or record of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation and employing solvent based coatings; and

c. a record of all periods of time during which solvent based coatings were employed, but the VOC emissions were not vented to the RTO.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004]

(2) The permittee shall operate and maintain, a continuous pressure drop monitor and recorder which measures and records the pressure drop across the total enclosure when the permittee is employing solvent based coatings in this emissions unit. Units shall be in inches of water. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The pressure drop 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 each day:

a. all three hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential, in inches of water as a 3-hour average, specified in c)(3); and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004]

(3) The permittee shall collect and record the following information monthly for all non-solvent based coatings (and inks, see b)(2)b) employed in this emissions unit:

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in kg/kg of coating solids, as applied;

c. the weight fraction of VOC in each coating;

d. the weight fraction of solids in each coating;

e. the total mass of each coating, in kgs; and

f. the mass-weighted average VOC content for all the coatings employed, in kg/kg of coating solids, calculated in accordance with the equation in section 60.443(a)(2) of Subpart RR.

If the VOC content of each coating employed during the calendar month does not exceed .20 kg of VOC/kg of solids, the permittee has demonstrated compliance with the VOC content limitation for that month and is not required to calculate the mass-weighted VOC content for all the coatings employed during the calendar month.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004]

(4) The permittee shall collect and record the following information daily for all the coatings employed in this emissions unit that are vented to the RTO (solvent based coatings) and the cleanup materials associated with those coatings:

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

b. the VOC content of each coating, excluding water and exempt solvents, as applied, in pounds per gallon;

c. the number of gallons of each coating employed, excluding water and exempt sovents;

d. the name and identification 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 total uncontrolled VOC emissions from all coatings, in tons;

h. the total uncontrolled VOC emissions from all cleanup materials, in tons;

i. the calculated, controlled VOC emission rate for all coatings, in tons (the controlled VOC emission rate for the coatings 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); and

j. the total VOC emission rate, i.e., controlled VOC emissions from all coatings plus uncontrolled emissions from all cleanup materials, in tons.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004]

(5) The permittee shall collect and record the following information daily for all the non-solvent based coatings (including inks and coatings from the print station. See b)(2)b.) employed in this emissions unit:

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

b. the VOC content of each coating, as applied, excluding water and exempt solvents, as applied, in pounds per gallon;

c. the number of gallons of each coating employed, excluding water and exempt solvents;

d. the name and identification 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 total VOC emissions from all coatings employed, in tons and from all coatings and cleanup materials employed, in tons; and

h. the daily volume-weighted average VOC content, in lbs per gallon of all the coatings employed, excluding water and exempt solvents, calculated in accordance with the equation in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

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

(6) The permittee shall record the following information daily:

a. the total daily VOC emissions from this emissions unit, i.e., the sum of the values from d)(4)j and d)(5)g (for all coatings and all cleanup materials);

b. the total operating hours of the coating line; and

c. the average hourly VOC emission rate, in pounds/hr.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004]

(7) The permittee shall inspect and monitor at least quarterly with a Photoionization Detector or equivalent device all positive pressure locations between the permanent total enclosure of the coater and the RTO for unacceptable VOC emissions (greater than 100 ppm by volume) and maintain records of the results in accordance with the permittee's leak monitoring program or equivalent. Records shall be maintained of each inspection and monitoring and shall include the following:

a. line speed;

b. fan speed (frequency is measured in hertz, an indirect measure of fan speed);

c. VOC content of the coating applied at the time of monitoring; and

d. an indication of any unacceptable VOCs.

The concentrations of VOC emissions measured in accordance with the leak monitoring program for the permanent total enclosure shall not exceed 100 ppm, by volume.

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

(8) The permittee shall maintain records of the maintenance and operation of the LEL units, or any other device or means approved by the Ohio EPA, which ensure that the emissions from solvent based coatings do not go directly to the ambient air, and these records shall be made available to the Director or his representative upon request during normal business hours.

The permittee shall record the date and duration of each period of bypassing while employing solvent based coatings.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004]

(9) Any device in the bypass that monitors a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482m2 (2/3/2004)]

(10) Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004]

(11) Per OAC rule 3745-21-09(Y), the permittee shall collect and record daily the following information for each coating and ink from the flexographic print station employed in this emission unit:

a. the name and identification of each coating and ink applied; and

b. the total VOC emissions from all inks and cleanup materials employed in this emisisons unit, in pounds.

(12) The permittee shall record the following information daily:

a. the total VOC emissions from this emissions unit, i.e., the sum of the values from d)(4)j, d)(5)g. and d)(11)b in pounds; (for all coatings, inks and cleanup materials);

b. the total operating hours for the emissions unit;

c. the average hourly emission rate, in pounds per hour (a/b); and

d. the summation of VOC emissions for the calendar year from all coatings (coatings from adhesive line, water based and emulsion, and inks and coatings from the print station) and cleanup materials, in tons.

(13) The permittee shall collect and record monthly the following information for all coatings, inks and all cleanup materials employed in this emissions unit:

a. the cumulative monthly sum of the daily values from d)(12); and

b. the cumulative, year to date, VOC emissions for the calendar year, in tons.

(14) The permittee shall maintain records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f).

In order to qualify for the exemption from the MACT requirements as described in 63.821(a)(2)(ii)(A), the permittee shall maintain the following records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f)(1) and (f)(2) for five years and submit them to the Director upon request:

a. the total mass of all materials, including inks, coatings, varnishes, adhesives, primers, solvents, thinners, and reducers, applied at product and packaging rotogravure stations and wide web flexographic stations in each month, including all inboard and outboard stations; and

b. the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers applied at all coating stations in the emissions unit each month;

c. the ratio of total mass of all materials applied by the printing operation using product and packaging rotogravure stations and wide web flexographic presses compared to the total mass of all materials used in the emissions unit, i.e., a/b x 100%; and

d. confirmation that all coaters are stand alone equipment as defined in the rule.

(15) On and after the compliance date specified in 40 CFR Section 63.3330, each owner or operator of an affected source subject to 40 CFR 63.3320 must maintain the records specified in paragraphs (a)(1) and (2) of 40 CFR 63.3410 on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1):

a. Records specified in Sec. 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, including if applicable:

i. continuous emission monitor data in accordance with the requirements of Sec. 63.3350(d);

ii. control device and capture system operating parameter data in accordance with the requirements of Sec. 63.3350(c), (e), and (f);

iii. organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(c);

iv. volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(d);

v. overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of Sec. 63.3360(e) and (f); and

vi. material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of Sec. 63.3370(b), (c), and (d).

b. Records specified in Sec. 63.10(c) for each CMS operated by the owner or operator in accordance with the requirements of Sec. 63.3350(b).

(16) Pursuant to 40 CFR 63.3350(c) and upon the compliance date, web coating lines with intermittently-controlled work stations shall be monitored for bypasses of the control device and the mass of each coating material applied at the work station during any such bypass. If using a control device for complying with the requirements of this subpart, you must demonstrate that any coating material applied on a never- controlled work station or an intermittently-controlled work station operated in bypass mode is allowed in your compliance demonstration according to Sec. 63.3370(n) and (o). The bypass monitoring must be conducted using at least one of the procedures in paragraphs (c)(1) through (4) of 40 CFR 63.3350(c) for each work station and associated dryer. The procedures are the following:

a. flow control position indicator;

b. car-seal or lock-and-key valve closures;

c. valve closure continuous monitoring; and

d. automatic shutdown system.

(17) When using a control device to comply with the emission standards in 40 CFR 63.3320, the permittee shall install, operate, and maintain each CPMS specified in paragraphs

(e)(9) and (10) and (f) of 40 CFR 63.3350 according to the requirements in paragraphs (e)(1) through (8) of 40 CFR 63.3350 . You must install, operate, and maintain each CPMS specified in paragraph (c) of 40 CFR 63.3350 according to paragraphs (e)(5) through (7) of 40 CFR 63.3350. Paragraphs (e)(1) through (e)(8) are listed below as terms (a) through (h):

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

b. The permittee shall have valid data from at least 90 percent of the hours during which the process operated.

c. The permittee shall determine the hourly average of all recorded readings according to paragraphs (16)(c)(i) and (ii) of 40 CFR Section 63.3350.

   i. To calculate a valid hourly value, the permittee 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 paragraph (e)(3) of 40 CFR Section 63.3350 clearly demonstrate continuous compliance with the standard that applies, then the permittee is not required to determine the hourly average of all recorded readings.

d. The permittee shall determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, 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. The permittee shall record the results of each inspection, calibration, and validation check of the CPMS.

f. At all times, the permittee shall 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), the permittee shall 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 Sec. 63.3370. All the valid data collected during all other periods in assessing compliance of the control device and associated control system shall be used. 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 the permittee does not have valid monitoring data and such data is required constitutes a deviation, and you must notify the Administrator in accordance with Sec. 63.3400(c).

e) Reporting Requirements

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

a. all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified above; and

b. all periods when the stack that bypasses the RTO was used while employing solvent based coatings in the emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004)]

(2) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any monthly record showing that the mass-weighted average VOC content for the non-solvent based coatings exceeded the applicable limitation of 0.20 kg of VOC per kg of coating solids, as applied.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 45 days after the exceedance(s) occurred.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004)]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify all three-hour blocks of time, when the emissions unit was in solvent based operation, during which the permanent total enclosure was not maintained at the minimum pressure differential required in d)(3).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004)]

(4) The permittee shall submit deviation (excursion) reports that identify each day during which the average hourly VOC emissions exceeded 22.03 pounds per hour, and the actual average hourly VOC emissions for each such day.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004)]

(5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004)]

(6) Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR Part 63 Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

a. the methods used to determine compliance;

b. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Part Subpart JJJJ;

e. an analysis demonstrating whether the affected source is a major source or an area source;

f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

g. a statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63, Subpart JJJJ.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004)]

(7) The permittee shall submit quarterly deviation reports that identify all exceedances of the 100 ppm, by volume, VOC concentration limitation specified in c)(8).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004)]

(8) The permittee shall submit deviation (excursion) reports that identify all exceedances of the 5% limit (the ratio of total mass of all materials applied on the product and packaging rotogravure work stations and wide web flexographic work stations to the total mass of all materials applied in the emissions unit), which exempts this printing operation from the requirements of the MACT standard as described in 40 CFR Part 63, Subpart KK, Section 63.821(a)(2)(ii)(A).

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004)]

(9) Pursuant to 40 CFR 63.3400 (c) and upon the compliance date in 40 CFR Part 63.3330, the permittee shall submit a semiannual compliance report according to paragraphs (c)(1) and (2) of 40 CFR 63.3400.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 m2 (2/3/2004)]

f) Testing Requirements

(1) USEPA Method 24 shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine VOC content for all coatings. VOC content from data sheets, resulting from the use of Method 24 may also be used. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the cleanup materials.

If pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall

use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Formulation data, using the upper range of VOC content, may be used for VOC content compliance demonstration of experimental coatings if the amount of a specific formulation of an experimental coating used is less than 250 gallons per year or if the formulation data for a coating is based upon Method 24.

The amount of experimental coatings manufactured shall be the amount necessary to do the experiment and no extra shall be produced for the sole purpose of sale or exchange for commercial profit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 (2/3/2004)]

(2) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

98.3% overall VOC reduction by weight (with a 100% capture efficiency and a minimum 98.3% destruction efficiency) for all coatings except non-solvent based coatings

Applicable Compliance Method:

Performance testing shall be conducted for the PTE and the destruction efficiency, within 6 months prior to permit expiration using the following methods:

40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M, Method 204 or any other method approved by Ohio EPA.

Performance testing shall be in accordance with OAC rule 3745-21-10(C).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 (2/3/2004)]

b. Emission Limitation:

0.20 kilogram of VOC per kilogram of solids, as applied, when not using the thermal oxidizer.

The VOC content limitation of these coatings is 0.2 kg VOC per kg coating solids, as applied.

Applicable Compliance Method:

Compliance shall be based upon the use of Method 24, or any alternative compliance method approved by the USEPA for determining the VOC content of each coating, and on the record keeping requirements in d)(3).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 (2/3/2004)]

c. Emission Limitation:

22.03 lbs VOC/hr on a daily average basis

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements in d)(4), d)(5), d)(6), d)(11) and d)(12).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 (2/3/2004)]

d. Emission Limitation:

95.33 tons VOC per year

Applicable Compliance Method:

Compliance shall be determined by the sum of the values for the calendar year based on the record keeping requirements in d)(4), d)(5), d)(11), d)(12) and d)(13).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 (2/3/2004)]

(3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation, i.e. the destruction efficiency and capture efficiency limitation for VOC of 98.3% and 100%, respectively .

c. The following test method shall be employed to demonstrate compliance with the overall control efficiency limitation for VOC:

i. Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

ii. Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and

iii. Method 204 of 40 CFR Part 51, Appendix M.

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

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

e. The capture efficiency shall be determined using Methods 204 through Method 204F, as specified 40 CFR Part 51, Appendix M, or the permittee may request to

use an alternative method or procedure for the determination of capture efficiency in accordance with the "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request for the use of an alternative method, including an evaluation of the applicability, neccessity, and validity of the alternative method, and may approve its use, if such approval does not contravene any other applicable requirement.)

f. The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10. 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.

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA and local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

h. Personnel from the Northeast District Office of the Ohio EPA and local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

i. 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 Northeast District Office of the Ohio EPA 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 Northeast District Office of the Ohio EPA.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 (2/3/2004)]

(4) Pursuant to 40 CFR 63.3320 and on the compliance date specified in 40 CFR 63.3330, the source must limit HAP emissions to:

a. no more than 5 percent of the organic HAP applied for each month (95 percent reduction); or

b. no more than 4 percent of the mass of coating materials applied for each month; or

c. no more than 20 percent of the mass of coating solids applied for each month.

Applicable Compliance Method:

Compliance with these limits will be demonstrated by demonstrating compliance with the limits in 40 CFR Part 60 Subpart RR and by demonstrating compliance with control efficiency established by OAC rule 3745-31-05(a)(3). These demonstrations will be made through recordkeeping and reporting as specified in Testing Requirements section for this unit.

Demonstrate compliance through performance tests of capture efficiency and control device efficiency, continuous monitoring of capture system, and CPMS for control device operating parameters for each oxidizer used to control emissions from one or more web coating lines the following shall be applied:

d. Monitor the operating parameter in accordance with 40 CFR 63.3350(e) to ensure control device efficiency; and

e. For each capture system delivering emissions to that oxidizer, monitor the operating parameter established in accordance with 40 CFR 63.3350(f) to ensure capture efficiency; and

f. Determine the organic HAP emissions for those web coating lines served by each capture system delivering emissions to that oxidizer either:

i. In accordance with paragraphs (k)(1)(i) through (vi) of 40 CFR 63.3370, if the web coating lines served by that capture and control system have only always-controlled work stations; or

ii. In accordance with paragraphs (k)(1)(i) through (iii), (v), and (o) of 40 CFR 63.3370, if the web coating lines served by that capture and control system have one or more never-controlled or intermittently-controlled work stations.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 02-17482 (2/3/2004)]

g) Miscellaneous Requirements

(1) The permittee shall employ a (written) plan for preventive maintenance and repair of leaks within the solvent capture and destruction system which requires testing for leaks in all positive pressure locations of the capture system, i.e. is the permanent total enclosure and prompt corrective action upon discovery of leaks.

(2) Equipment subject to the plan shall include all ductwork from the enclosures of the heads of the coaters to the thermal oxidizer, the ovens and the thermal oxidizer fan cover.

[Authority for Term: PTI 02-9533]

3. **K004, Banner Line**

Operations, Property and/or Equipment Description:

Banner Line - Fabric/paper coating and laminating with print stations.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A) (PTI 02-21880)	VOC emissions from this emissions unit, including cleanup, shall not exceed 0.59 pound per hour on an average daily basis, and 2.63 tons per year, which includes 0.14 pounds per hour on an average daily basis and 0.63 tons per year from the ink spray print station. Particulate emissions from this emissions unit shall not exceed 0.36 lb/hr and 1.6 tons per year. See b)(2)f. Particulate emissions from this emissions unit shall be controlled with an efficiency of 99%. No visible particulate emissions shall result from the operations of this emissions unit. Visible emissions shall be eliminated by the implementation and maintenance of a dry filter system or system of comparable control.
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-09(G)	The VOC content for the coatings employed in this emissions unit shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvent.
e.	OAC rule 3745-21-09(Y)	For all inks and coatings employed at either the print stations of this emissions unit, the VOC content of the coatings and inks shall not exceed forty percent by volume, of that coating and ink, excluding water and exempt solvents or twenty-five percent VOC, by volume, of the volatile matter in the coating and ink.
f.	40 CFR Part 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry)	Gravure print station: Exempt by 40 CFR 63.821(a)(2)(ii)(A). See c)(1). Ink spray printing station: Exempt by 40 CFR 63.821(b)(2). See c)(2).
g.	40 CFR Part 63, Subpart OOOO (National Emission Standards for the Printing, Coating, and Dyeing of Fabrics and Other Textiles Industry)	Exempt by 40 CFR 63.4281(c). See c)(4).
h.	40 CFR Part 63, Subpart B, Case by Case MACT and OAC rule 3745-31-28	See b)(2)i.

(2) Additional Terms and Conditions

a. This emissions unit operates in one of two distinctive mutually exclusive modes, manufacturing banner material or manufacturing EZ liner material.

b. As long as the fabric adhesive coating is 100% reactive, and exposure of non-laminated coated fabric is approximately 1 second, (line speed 200 ft/min) and the VOC content of the coating is no more than 0.0006 lb per gallon, it will be

presumed that no emissions result from the fabric adhesive coating line of this emissions unit.

c. The Banner coating line is used to coat fabric and then laminate it between sheets of vinyl film and is equipped with an infrared oven, an electric hot oil heated roll curing station, with a gravure print station, with a UV oven, all venting into the building.

d. PTI #02-21880, a Chapter 31 modification was necessary based on particulate emissions, a new type of air contaminants, resulting from the installation of a new ink spray printing station, in accordance with the definition of modification from Ohio Administrative Code 3745-31-01(VV). In addition, the annual VOC allowable is being increased to account for DeMinimis quantities

e. UV inks with a "de minimis" amount of VOC (less than 0.1%) based on formulation data provided by the manufacturer shall not be required to conduct Method 24 testing.

f. The permittee shall maintain and use dry filters or other comparable control of overspray based on efficiency, whenever the ink spray printing station is in operation.

g. No record keeping for particulate emissions will be required by this permit because allowables are based on maximum potential emissions.

h. Organic HAPs for the purposes of this permit, shall be defined as HAPs at a concentration of 0.1% by weight or greater based on the definition from 40 CFR Part 63, Subpart OOOO.

i. The natural gas fuel fired oven burners/heaters for process heat associated with this emissions unit are small gaseous fuel fired process heaters with heat input ratings below 10 mmBtu/hr.

These burners/heaters were originally affected sources with no applicable requirements, subject to 40 CFR Part 63, Subpart DDDDD " Boiler MACT ", until this rule was vacated on July 30, 2007. On this date, the burners/heaters became subject to 40 CFR Part 63, Subpart B "Case by Case MACT " . The permittee has chosen to continue to comply with Subpart DDDDD requirements in lieu of creating and submitting an alternative specific regulation for the heaters.

c) Operational Restrictions

(1) The permittee shall operate this emissions unit (the gravure print station) such that the sum of total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other material applied at product and packaging rotogravure work stations, including all inboard and outboard stations, in each month never exceeds five percent, by weight of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied at all coating stations in the emissions unit in that month, as described in section 63.821(A) of 40 CFR Part 63, Subpart KK.

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

(2) The permittee shall apply or employ coatings, including cleanup, in the new spray printing station that contain no organic HAPs to comply with section 63.821(b)(2) of 40 CFR Part 63, Subpart KK.

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

(3) As described in 40 CFR Part 63, Subpart KK, section 63.821(b)(2), the permittee shall apply no more than 400 kg (880 lbs) for every month, of organic HAP on product and packaging rotogravure or wide-web flexographic printing presses.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f).

(2) In order to qualify for the exemption from the MACT requirements as described in 63.821(a)(2)(ii)(A), the permittee shall maintain the following records as required in 40 CFR Part 63, Subpart KK, Section 63.829(f)(1) and (f)(2) for five years and submit to the Director upon request:

a. the total mass of all materials including inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers applied at product and packaging rotogravure work stations in each month, including all indoor and outboard stations;

b. the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers applied in all coating stations in the emissions unit each month;

c. the ratio of total mass of all materials applied by the printing operation using product packaging rotogravure or wide web flexographic compared to the total mass of all materials used in the emissions unit, that is, a/b x 100 %; and

d. confirmation that this coater is "stand alone coating equipment" as defined by the rule.

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

(3) Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

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

(4) The permittee shall collect and record the following information daily for all coatings and inks employed in this emissions unit:

a. the name and identification number of each coating and ink employed or applied;

b. the coatings that are not subject to OAC rule 3745-21-09(Y)(1), the VOC content, in pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents; and

c. for coatings and inks that are subject to OAC rule 3745-21-09(Y)(1), the percent VOC by volume of the coating or ink, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating or ink.

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

(5) The permittee shall collect and record the following information daily for all coatings and inks employed in this emissions unit:

a. the total VOC emissions from the gravure print station, in lbs;

b. the total VOC emissions from the ink spray print station, in lbs;

c. the total VOC emission from cleanup of the gravure print station, in lbs;

d. the total VOC emissions from the cleanup of the ink spray print station, in lbs;

e. the total VOC emission from cleanup of the fabric coating line, in lbs;

f. the total VOC emissions from this emission unit, in lbs and tons;

g. the total operating hours of the emissions unit; and

h. the daily average emissions of VOC, including cleanup from the emissions unit, in lbs per hour.

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

(6) The permittee shall collect and record the following information daily for all coatings and inks employed in every product and packaging rotogravure and/or every wide-web flexographic printing press on the F-3 coater:

a. the total VOC emissions from the rotogravure print station on the F3 coater, in lbs; and

b. the total VOC emissions from the cleanup of the rotogravure print station on the F3 coater, in lbs.

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

(7) The permittee shall calculate the following summations, monthly:

a. the monthly summation of daily organic HAP emissions from all product and packaging rotogravure and/or every wide-web flexographic printing presses, in lbs [(4a + 4c) + (5a + 5b)].

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

(8) The permittee shall record and sum total annual VOC emissions in tons per year from this emissions unit.

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

(9) The permittee shall record any instance where fabric coatings used in the emissions unit contained "organic HAPs" as defined in 40 CFR Part 63, Subpart OOOO, section 63.4371.

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

(10) The permittee shall record any instance where VOC content of fabric coating employed in this emissions unit is greater or equal to 0.1%, by weight.

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

e) Reporting Requirements

(1) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the VOC content of any coating, that is not subject to OAC rule 3745-21-09(Y)(1), exceeded the applicable limitation of 2.9 pounds of VOC per gallon of coating applied, excluding water and exempt solvents.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

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

(2) The permittee shall notify the Director (the Northeast District of the Ohio EPA) in writing of any daily record showing that the VOC content of any coating or ink, that is subject to OAC rule 3745-21-09(Y)(1), exceeded both applicable limitations of 40% VOC by volume of the coating or ink, excluding water and exempt solvents, and 25% VOC by volume of the volatile matter in the coating or ink.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

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

(3) The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the emission rate of VOCs, including cleanup, on an average daily basis, exceeded the applicable limitation of 0.59 lb per hour.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

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

(4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the 5% limit (the ratio of the total mass of all materials applied by the printing operation

using product and packaging rotogravure work stations or wide web flexographic, including all inboard and outboard stations, compared to the total mass of all materials applied in the emissions unit). This 5% limit exempts this printing operation from the requirements of the MACT standard as described in 40 CFR Part 63, Subpart KK, Section 63.821(a)(2)(ii)(A).

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

(5) The permittee shall report any instance where fabric coatings used in the emissions unit contained "organic HAPs", as defined in 40 CFR Part 63, Subpart OOOO, section 63.4371.

The notification/report shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

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

(6) The permittee shall submit deviation (excursion) reports that identify any month during which the application of organic HAP (i.e, all HAPs) exceeds 400 kg (880 lbs) for all product and packaging rotogravure and wide-web flexographic printing stations.

The notification/report shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 30 days following the end of the calendar month in which the excursion(s) occurred.

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

f) Testing Requirements

(1) USEPA Method 24 or Method 24A shall be used in accordance with OAC rule 3745-21-04(B)(5), to determine the VOC contents of all coatings and inks. If pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternate analytical procedures or alternate precision statements for Method 24 and/or Method 24A.

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

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

(2) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

For the coatings employed in this emissions unit that are not subject to OAC rule 3745-21-09(Y)(1), VOC content shall not exceed of 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvent.

Applicable Compliance Method:

Compliance with the above emission limitation shall be based on the record keeping in d)(3).

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

b. Emission Limitation:

For all inks and coatings employed at the print station of this emissions unit, [that is those subject to OAC rule 3745-21-09(Y)(1)], 40% VOC by volume of the coating or ink, excluding water and exempt solvents or 25% VOC by volume of the volatile matter in the coating or ink.

Applicable Compliance Method:

Compliance with the above emission limitation shall be based on the record keeping in d)(3).

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

c. Emission Limitation:

VOC emissions from this emissions unit, including cleanup, shall not exceed 0.59 pound per hour, on an average daily basis, and 2.63 tons per year.

Applicable Compliance Method:

Compliance will be determined based on the record keeping in d)(4) and d)(5).

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

d. Emission Limitation:

No visible emissions.

Applicable Compliance Method:

If required, compliance with the visible particulate limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22.

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

g) Miscellaneous Requirements

(1) None.