State of Ohio Environmental Protection Agency

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10/13/2009

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Morgan Adhesives Company (MACtac)
Facility ID: 1677110026
Permit Type: Renewal
Permit Number: P0103400

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Akron Regional Air Quality Management District

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

PROPOSED

Air Pollution Title V Permit
for
Morgan Adhesives Company (MACtac)

Facility ID:	1677110026
Permit Number:	P0103400
Permit Type:	Renewal
Issued:	10/13/2009
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
Morgan Adhesives Company (MACtac)

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1. K015, Coating Line GS 26

2. Emissions Unit Group - Pressure Sensitive Coating Lines: K004, K006, K007, K008, K009, ... 30

Authorization

Facility ID: 1677110026
Facility Description: Pressure Sensitive Laminates.
Application Number(s): A0035277
Permit Number: P0103400
Permit Description: pressure sensitive web coating
Permit Type: Renewal
Issue Date: 10/13/2009
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Superseded Permit Number: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:

Morgan Adhesives Company (MACtac)
4560 Darrow Road
Stow, OH 44224

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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District.
(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.6.

2. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. The emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

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

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJ: K004, K006 - K009, K015 and Z001.

   a) Applicable Emissions Limitations and/or Control Requirements

      (1) Facility wide HAP emissions shall not exceed the listed limitations.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart JJJJ	Organic HAP emissions shall not exceed 4 percent of the mass of coating materials applied for each month; or Organic HAP emissions shall not exceed 20 percent of the mass coating solids applied for each month.
b.	40 CFR 63.1-15	Table 2 to Subpart JJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

   b) Additional Terms and Conditions

      (1) None.

   c) Operational Restrictions

      (1) Operating limits if using add-on control devices and capture system

         a. <u>Catalytic Oxidizer</u> – The average temperature at the inlet to the catalyst bed in any 3-hour period must not fall below the combustion temperature limit established according to 40 CFR 63.3360(e)(3)(ii).

         b. <u>Capture System</u> – Submit monitoring plan to the Administrator that identifies operating parameters to be monitored according to 40 CFR 63.3350(f).

         (Authority for term: 40 CFR Part 63.3321(a), Subpart JJJJ Table 1)

d) Monitoring and/or Recordkeeping Requirements

(1) Required monitoring for intermittently-controlled work stations

a. Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that provides a record indicating whether the exhaust stream from the dryer was directed to the control device or was diverted from the control device. The time and flow control position must be recorded at least once per hour as well as every time the flow direction is changed. A flow control position indicator must be installed at the entrance to any bypass line that could divert the exhaust stream away from the control device to the atmosphere.

(Authority for term: 40 CFR Part 63.3350(a)(1) and (c))

(2) Required monitoring for solvent recovery units using a liquid-liquid material balance

a. Install, calibrate, maintain, and operate according to the manufacturer's specifications a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device must be certified by the manufacturer to be accurate to within 2.0 percent by mass.

(Authority for term: 40 CFR Part 63.3350(a)(2) and (d))

(3) Continuous parameter monitoring system (CPMS) for stations using a control device

a. Install, operate, and maintain each CPMS specified in 40 CFR Part 63.3350(e)(9) and (10) and 40 CFR Part 63.3350(f) according to the requirements in 40 CFR Part 63.3350(e)(1) through (8).

b. Install, operate, and maintain each CPMS specified in 40 CFR Part 63.3350(c) according to 40 CFR Part 63.3350(e)(5) through (7).

(Authority for term: 40 CFR Part 63.3350(a)(3) and (e))

(4) Required monitoring for capture systems

a. To comply with the emission standards in 40 CFR 63.3320 through the use of a capture system and control device for one or more web coating lines:

i. Must develop a site-specific monitoring plan containing the information specified in 40 CFR Part 63.3350 (f)(1) and (2) for these capture systems; and

ii. Must monitor the capture system in accordance with 40 CFR Part 63.3350(f)(3) of this section; and

iii. Must make the monitoring plan available for inspection by the permitting authority upon request.

(Authority for term: 40 CFR Part 63.3350(a)(4) and (f))

(5) General required monitoring

a. Following the date on which the initial performance test of a control device is completed to demonstrate continuing compliance with the standards:

i. Must monitor and inspect each capture system and each control device used to comply with 40 CFR 63.3320; and

ii. Must install and operate the monitoring equipment as specified in 40 CFR Part 63.3350(c) and (f).

(Authority for term: 40 CFR Part 63.3350(b))

(6) Recordkeeping

a. Each permittee subject to this subpart must maintain the records specified in 40 CFR 63.3410(a)(1) and (2) on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1).

b. Each permittee subject to this subpart must maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.3370. The records must be maintained in accordance with the requirements of 40 CFR 63.10(b).

(Authority for term: 40 CFR Part 63.3410)

e) Reporting Requirements

(1) Notifications

a. Submit a semiannual compliance report according to 40 CFR Part 63.3400(c)(1) and (2) of this section.

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

c. Submit a Notification of Compliance Status as specified in 40 CFR 63.9(h).

d. Submit performance test reports as specified in 40 CFR 63.10(d)(2) if using a control device to comply with the emission standard and have not obtained a waiver from the performance test requirement or are not exempted from this requirement by 40 CFR 63.3360(b). The performance test reports must be submitted as part of the notification of compliance status required in 40 CFR 63.3400(e).

e. Submit startup, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5).

f. The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart JJJJ.

(Authority for term: 40 CFR Part 63.3400)

f) Testing Requirements

(1) Performance testing for stations using a control device

a. Conduct a performance test for each capture and control system to determine:

i. the destruction or removal efficiency of each control device other than solvent recovery according to 40 CFR 63.3360(e); and

ii. the capture efficiency of each capture system according to 40 CFR 63.3360(f).

iii. If applicable, determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere according to 40 CFR 63.3360(g).

(Authority for term: 40 CFR Part 63.3360(a)(2))

(2) Organic HAP mass fraction determination

a. To determine compliance with the emission standards in 40 CFR 63.3320 by means other than determining the overall organic HAP control efficiency of a control device:

i. determine the organic HAP mass fraction of each coating material ‘‘as-purchased’’ by following one of the procedures in 40 CFR Part 63.3360(c)(1) through (3); and

ii. determine the organic HAP mass fraction of each coating material ‘‘as-applied’’ by following the procedures in 40 CFR Part 63.3360(c)(4).

iii. If the organic HAP content values are not determined using the procedures in 40 CFR Part 63.3360(c)(1) through (3), the Permittee must submit an alternative test method for determining their values for approval by the Administrator in accordance with 40 CFR 63.7(f). The recovery efficiency of the test method must be determined for all of the target organic HAP and a correction factor, if necessary, must be determined and applied.

(Authority for term: 40 CFR Part 63.3360(c))

(3) Control device efficiency

a. If using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in 40 CFR 63.3320, conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in 40 CFR Part 63.3360(e)(1)

and (2) of this section. During the performance test, establish the operating limits required by 40 CFR 63.3321 according to 40 CFR Part 63.3360(e)(3).

(Authority for term: 40 CFR Part 63.3360(e))

(4) Capture efficiency

a. To demonstrate compliance by meeting the requirements of 40 CFR 63.3370(e), (f), (g), (h), (i)(2), (k), (n)(2) or (3), or (p), determine capture efficiency using the procedures in 40 CFR Part 63.3360(f)(1), (2), or (3), as applicable.

(Authority for term: 40 CFR Part 63.3360(f))

g) Miscellaneous Requirements

(1) Compliance demonstration for use of a combination of compliant coatings and control devices

a. Follow the procedures set out in 40 CFR 63.3370(f) to determine compliance with 40 CFR 63.3320(b)(3) according to 40 CFR 63.3370(n), or

b. Follow the procedures set out in 40 CFR 63.3370(g) to determine compliance with 40 CFR 63.3320(b)(2) according to 40 CFR 63.3370(n).

(Authority for term: 40 CFR Part 63.3370(a)(6))

(2) Combinations of capture and control

a. If the permittee operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controlled work stations, calculate organic HAP emissions according to the procedures in 40 CFR Part 63.3370(n)(1) through (4), and use the calculation procedures specified in 40 CFR Part 63.3370(n)(5) to convert the monitoring and other data into units of the selected control option in 40 CFR Part 63.3370(e) through (h) of this section. Use the procedures specified in 40 CFR Part 63.3370(n)(6) to demonstrate compliance.

(Authority for term: 40 CFR Part 63.3370(n))

The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

4. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart KK: Z092.

a) Applicable Emissions Limitations and/or Control Requirements

(1) Facility wide HAP emissions shall not exceed the listed limitations.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

a.	40 CFR Part 63.821(b)(2)	The permittee shall not employ more than 400 kg per month, for every month, of organic HAP on all effective printing stations combined.
b.	40 CFR Part 63.829(e)(2)	The permittee shall maintain records of the total mass and organic HAP content of each material applied on all effective printing stations during each month.

b) Additional Terms and Conditions

(1) None.

c) Operational Restrictions

(1) The permittee shall not employ more than 400 kg per month, for every month, of organic HAP on all printing stations combined.

(Authority for term: 40 CFR Part 63, Subpart KK)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each month for each ink employed in emissions unit Z092:

a. The name and identification number;

b. The organic HAP content, in weight percent;

c. The quantity of ink applied, in pounds.

(Authority for term: 40 CFR Part 63, Subpart KK)

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing that more than 400 kg of organic HAP was employed in the facility's effective printing stations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: 40 CFR Part 63, Subpart KK)

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 63, Subpart KK)

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

Z001 – R&D Pilot Coater; and
Z092 - #12 Slitter Print Station.

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

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

6. 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:

B018 - Industrial Reliance Boiler (B-12) - 8,400,000 Btu/hr;
B019 - Industrial Reliance Boiler (B-13) - 8,400,000 Btu/hr;
B020 - Industrial Reliance Boiler (B-14) - 8,400,000 Btu/hr;
Z002 - Mixing Tank A-1 Cmpd Room A, 1100-gal;
Z003 - Mixing Tank A-2 Cmpd Room A, 1100-gal;
Z004 - Mixing Tank A-3 Cmpd Room A, 1100-gal;
Z005 - Mixing Tank A-4 Cmpd Room A, 1100-gal;
Z006 - Mixing Tank A-5 Cmpd Room A, 1100-gal;
Z007 - Mixing Tank A-6 Cmpd Room A, 1100-gal;
Z008 - Mixing Tank A-7 Cmpd Room A, 1100-gal;
Z009 - Mixing Tank A-8 Cmpd Room A, 1100-gal;
Z010 - Feed Tank A-9 Cmpd Room A, 1100-gal;
Z011 - Feed Tank A-10 Cmpd Room A, 1100-gal;
Z012 - Feed Tank A-11 Cmpd Room A, 1100-gal;
Z013 - Feed Tank A-12 Cmpd Room A, 1100-gal;
Z014 - Compound Room R;
Z015 - Underground Storage Tank T01, 10,000-gal;
Z016 - Underground Storage Tank T02, 10,000-gal;
Z017 - Underground Storage Tank T03, 10,000-gal;
Z018 - Underground Storage Tank T04 10,000-gal;
Z019 - Underground Storage Tank T05, 10,000-gal;
Z020 - Underground Storage Tank T06, 10,000-gal;
Z021 - Mixing Tank B-1 Cmpd Room B, 1100-gal;
Z022 - Mixing Tank B-2 Cmpd Room B, 1100-gal;
Z023 - Mixing Tank B-3 Cmpd Room B, 1100-gal;
Z024 - Mixing Tank B-4 Cmpd Room B, 1100-gal;
Z025 - Mixing Tank B-5 Cmpd Room B, 1100-gal;

Z026 - Mixing Tank B-6 Cmpd Room B, 1100-gal;
Z027 - Mixing Tank B-7 Cmpd Room B, 1100-gal;
Z028 - Mixing Tank B-8 Cmpd Room B, 1100-gal;
Z029 - Mixing Tank B-9 Cmpd Room B, 1700-gal;
Z030 - Storage Tank C-7 Cmpd Room B-Annex, 5900-gal;
Z031 - Storage Tank C-8 Cmpd Room B-Annex, 5900-gal;
Z032 - Storage Tank C-9 Cmpd Room B-Annex, 5900-gal;
Z033 - Rubber Grinder;
Z034 - Storage Tank C-10 Cmpd Room B-Annex;
Z035 - Storage Tank C-1 Cmpd Room C, 1530-gal;
Z036 - Storage Tank C-2 Cmpd Room C, 1530-gal;
Z037 - Storage Tank C-11 Cmpd Room C-Annex, 5500-gal;
Z038 - Storage Tank C-12 Cmpd Room C-Annex, 5500-gal;
Z039 - Storage Tank C-13 Cmpd Room C-Annex, 5500-gal;
Z040 - Storage Tank C-14 Cmpd Room C-Annex, 5500-gal;
Z041 - Storage Tank C-15 Cmpd Room C-Annex, 5500-gal;
Z042 - Storage Tank C-16 Cmpd Room C-Annex, 5500-gal;
Z043 - Storage Tank C-17 Cmpd Room C-Annex, 5500-gal;
Z044 - Storage Tank C-18 Cmpd Room C-Annex, 5500-gal;
Z047 - Storage Tank V-2, 500-gal;
Z048 - Storage Tank V-3, 1100-gal;
Z049 - Storage Tank V-4, 1100-gal;
Z050 - Gravure Roll/Mayer Rod Cleaning Station, CS-1;
Z051 - Solvent Recovery Decanter Tank, D-4;
Z052 - Solvent Recovery Dirty Solvent Collection Tank, D-5;
Z053 - Solvent Recovery Seal Tank, D-7;
Z054 - Solvent Recovery - Dirty Solvent Feed Tank, D-8;
Z055 - PRI Distillation Unit, P-3;
Z056 - Distilled Solvent Collection and Feed Tank, D10;
Z057 - Laboratory Environmental Test Chambers;
Z058 - Laboratory Fume Hood-Casting Room;
Z059 - Laboratory Bench top UV Curing Oven;
Z060 - Environmental Test Chambers (2);
Z061 - R&D Test Oven;
Z062 - Pilot Plant Cleaning/Testing Bench;
Z063 - R&D Hot Melt Adhesive Mixer, and Coater;
Z064 - R&D Pilot Coater Corona Treater;
Z066 - R&D Casting Room Ovens;
Z067 - QA Lab Fume Hood and Test Ovens;
Z068 - QA Lab Fume Hood and Test Oven;
Z069 - QA Lab Ovens;
Z070 - Bottling Cage;
Z071 - Welding Hood - Maintenance;
Z074 - Burnham Hot Water Boiler B-1, 1,326,000 Btu/hr;
Z075 - Burnham Hot Water Boiler B-2, 1,326,000 Btu/hr;
Z076 - American Standard Hot Water Boiler B-3, 780,000 Btu/hr;
Z083 - Bryan Hot Water Boiler B-4, 650,000 Btu/hr;
Z084 - Weil McLain Hot Water Boiler B-5, 390,000 Btu/hr;
Z085 - Burnham Hot Water Boiler B-6, 164,000 Btu/hr;
Z086 - Burnham Hot Water Boiler B-7, 780,000 Btu/hr;
Z087 - Misc. Direct/Indirect Space Heaters (<3,000,000 Btu/hr each);

Z088 - G-Line Corona Treater;
Z089 - H-Line Corona Treater;
Z090 - J-Line Corona Treater; and
Z091 - K-Line Corona Treater.

C. Emissions Unit Terms and Conditions

1. K015, Coating Line GS

Operations, Property and/or Equipment Description:

Coating Line GS. Narrow web hot melt pressure sensitive coater and slitter.

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) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 16-02086)	0.002 pound of volatile organic compounds (VOC) per pound of coating solids applied 19.2 pounds of VOC per day from coatings 5.8 tons of VOC per year from coatings and cleanup materials
b.	OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the above emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	40 CFR Part 60, Subpart RR	The emission limitation specified by this rule is less stringent than the above emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart JJJJ	See Section B.3.

(2) Additional Terms and Conditions

a. None

.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification of each coating employed;

b. the VOC content of each coating, in pound(s) per gallon;

c. the solids content of each coating, in pounds per gallon;

d. the number of gallons of each coating employed;

e. the total solids applied for each coating, in pounds;

f. the VOC content of each coating, in pound(s) of VOC per pound of coating solids applied;

g. the VOC emission rate from each coating employed, in pounds;

h. the VOC emission rate from all coatings employed, in pounds;

i. the name and identification of each cleanup material employed;

j. the VOC content of each cleanup material, in pounds per gallon;

k. the number of gallons of each cleanup material employed;

l. the VOC emission rate from each cleanup material employed, in pounds;

m. the VOC emission rate from all cleanup materials employed, in pounds;

n. the total VOC emission rate from all coatings and cleanup materials, in pounds;

o. the total number of days the emissions unit operated during the month; and

p. the average daily VOC emission rate for all coatings employed, in pounds.

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

(2) The permittee shall comply with the applicable monitoring and record keeping requirements specified under 40 CFR Part 63, Subpart JJJJ. See Section B.3.(d).

(Authority for term: 40 CFR Part 63, Subpart JJJJ)

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing (a) the use of noncomplying coatings (i.e., VOC coating content) and/or (b) that the average daily VOC emission limitation was exceeded. The notification shall include a copy of such record and shall be

sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

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

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

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

f) Testing Requirements

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

a. Emission Limitation

0.002 pound of VOC per pound of coating solids applied

Applicable Compliance Method

Compliance with this emission limitation shall be demonstrated through the records required pursuant to Section C.1.d)(1).

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

b. Emission Limitation

19.2 pounds of VOC per day from coatings

Applicable Compliance Method

Compliance with this emission limitation shall be demonstrated through the records required pursuant to Section C.1.d)(1).

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

c. Emission Limitation

5.8 tons of VOC per year from coatings and cleanup materials

Applicable Compliance Method

Compliance with this emission limitation shall be demonstrated through the records required pursuant to Section C.1.d)(1).

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

(2) Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC

contents of the coatings. Formulation data shall be used to determine the VOC contents of the cleanup materials.

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

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the ”Toxic Air Contaminant Statute“, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: ORC 3704.03(F)(3)(c) and F(4))

2. Emissions Unit Group - Pressure Sensitive Coating Lines: K004, K006, K007, K008, K009,

EU ID	Operations, Property and/or Equipment Description
K004	Coating Line E. Pressure sensitive coater
K006	Coating Line G. Pressure sensitive coater
K007	Coating Line H. Pressure sensitive coater
K008	Coating Line J. Pressure sensitive coater
K009	Coating Line K. Pressure sensitive coater

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 this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(F) and (H) The requirements of this rule have been replaced by the requirements specified in the facility-specific SIP revision approved by USEPA - Region 5 and promulgated in the Federal Register on April 17, 2001 (see 40 CFR Part 52.1870(c)(123)).	In lieu of the applicable limitations in OAC rules 3745-21-09(F) and (H), the actual daily emissions of VOC from all of the emissions units K004 and K006 through K009, calculated in accordance with section d)(3), shall comply each day with the facility-wide, daily allowable VOC emission limitation, calculated in accordance with section d)(2). The VOC contents of the coating materials shall be determined in accordance with OAC rule 3745-21-10(B).
b.	40 CFR Part 63, Subpart JJJJ	See Section B.3.
c.	40 CFR Part 52.1870(c)(123)	Volatile organic compound (VOC) emissions from emissions unit K009 shall not exceed 62.5 tons per year. The adhesive and top coating stations from emissions unit K009 shall be enclosed within a permanent total enclosure whenever solvent-based coatings are being applied at the station.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The average VOC concentration in the exhaust gases from the solvent recovery system, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions units controlled by the solvent recovery system were in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

(2) For each catalytic oxidizer, the average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions units controlled by a catalytic oxidizer are in operation and employing solvent-based coatings and emissions are to be vented to the catalytic oxidizer, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units were in compliance.

(*Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))*

(3) Each catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of each catalytic oxidizer shall be at least 90% at the temperature at which the inlet to the catalyst bed is set.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

(4) Each permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than -0.007 inch of water, and doors remain closed whenever the emissions unit controlled by the permanent total enclosure is in operation and employing solvent-based coatings, excluding momentary fluctuations (five minutes or less) resulting from entering and exiting any permanent total enclosure to perform required maintenance or operational activities.

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 52.1870(c)(123))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for each coating employed in coating lines K004 and K006 through K009:

a. the name and identification number;

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

c. the volume of coating applied, in gallons of coating, excluding water and exempt solvents;

d. the density of the VOC content, in pounds of VOC per gallon of VOC; and

e. the line in which the coating is applied, and, if applicable, an identification of any VOC control system to which the coating's VOC emissions are being vented;

i. if the control system is a solvent recovery system, record whether the VOC in the coating is recoverable or not recoverable via this control technology.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

(2) The daily allowable VOC emission limitation for coating lines K004 and K006 through K009 combined shall be calculated in accordance with the following equation and recorded on a daily basis:

$$Ad = (0.67) \sum_{i=1}^{n} Vi^{*} Li \frac{(D - Ci)}{(D - Li)}$$

where:

Ad = the daily allowable VOC emission limitation for coating lines K004 and K006 through K009 combined, in pounds of VOC;

n = subscript denoting the total number of coatings employed for the day;

i = subscript denoting a specific coating;

V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

C = VOC content of each surface coating applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents;

D = the density of VOC in each coating applied, in pounds of VOC per gallon of VOC (for the purpose of calculating Ad, a standard density of 7.36 will be used for all coatings); and

L = the emission limitation for each surface coating applied (this is 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a paper coating, and 4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, for a vinyl coating).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

(3) The actual daily VOC emissions (Ed) from coating lines K004 and K006 through K009 combined shall be determined in accordance with the following equation and recorded on a daily basis:

$$Ed = \sum_{i=1}^{n} Vi^* Ci^* (1 - Fi)$$

where:

Ed = the actual daily VOC emissions from coating lines K004 and K006 through K009 combined, in pounds of VOC;

n = subscript denoting the total number of coatings employed for the day;

i = subscript denoting a specific coating;

V = volume of each surface coating applied for the day, in gallons of coating, excluding water and exempt solvents;

C = VOC content of each surface coating as applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and

F = fraction, by weight, of VOC emissions from the coating reduced or prevented from being emitted to the ambient air (this is the overall efficiency of the capture system and control device).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

(4) The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the VOC concentrations in the exhaust gases from the solvent recovery system when the emissions units controlled by the solvent recovery system are in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic monitoring device 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 anytime solvent-based coatings are employed and emissions are to be vented to the solvent recovery system:

a. all periods of time when the capture (collection) system, control device, or monitoring equipment were not operating; and

b. all 3-hour blocks of time during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average concentration during the most recent performance test that demonstrated the emissions units were in compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

(5) The permittee also shall collect and record the following information each day for the solvent recovery system:

a. the total uncontrolled VOC emissions from all the coatings being vented to the solvent recovery system, in pounds per day (T);

b. the rolling, 7-day summation of the total uncontrolled VOC emissions from all the coatings being vented to the solvent recovery system, in pounds (T7);

c. the amount of VOC recovered by the solvent recovery system, in pounds per day (VOCrec);

d. the rolling, 7-day summation of the amount of VOC recovered by the solvent recovery system, in pounds (VOCrec,7); and

e. the rolling, 7-day average overall, fractional control efficiency of the solvent recovery system (SRE7).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

(6) Solvent Recovery System - Liquid-liquid material balance.

a. The overall control efficiency of the solvent recovery system shall be determined each day by directly comparing the input liquid VOC to the recovered liquid VOC. The procedure for use in this situation is specified in 40 CFR 60.443 with the following modifications: The permittee shall obtain data each day for the solvent usage and solvent recovery and determine the solvent recovery efficiency of the system each day using a rolling, 7-day period. The recovery efficiency for each day is computed as the ratio of the total recovered solvent for that day and the prior 6 consecutive operating days to the total solvent usage for the same 7-day period used for the recovered solvent, rather than a 30-day weighted average as given in 40 CFR 60.443. This ratio shall be expressed as a percentage. This shall be done within 72 hours following each 24-hour period.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123)

(7) Catalytic Oxidizers - Catalyst bed inlet temperature.

a. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of each catalytic oxidizer's catalyst bed when the emissions units controlled with the catalytic oxidizers are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer’s recommendations, with any modifications deemed necessary by the permittee.

b. The permittee shall collect and record the following information anytime solvent-based coatings are employed and emissions are to be vented to the catalytic oxidation system:

i. the operating temperature of the oxidizer catalyst bed. This temperature shall be recorded at least once every 15 minutes;

ii. any periods of time when any temperature monitoring device was not operating;

iii. any periods of time when any catalytic oxidizer alarm system indicates a malfunction of any catalytic oxidizer or an indication from any catalytic oxidizer fail-safe control system that the capacity of any catalytic oxidizer has been exceeded.

iv. all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before any catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission units were in compliance.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

(8) Catalytic Oxidizers - Work practice / inspection.

a. The permittee shall annually inspect internal structural integrity of oxidizer to ensure proper operation. The annual inspection shall consist of internal and visual inspections as detailed in the preventive maintenance checklist submitted to the Ohio EPA on February 12, 1999, and shall include a physical inspection of each unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. The checks of associated equipment shall be performed in accordance with the manufacturer's recommendations. Repair and replacement of equipment shall be performed as necessitated by the inspection.

b. The permittee shall conduct, or have conducted, an annual catalyst activity test using the catalyst sample(s) collected during the annual preventive maintenance inspection. An intent to test notification shall not be required for the testing noted in this section. The procedure for the catalyst activity test shall be in accordance with the document titled "Catalyst Activity Procedures" as submitted to the Ohio EPA on February 18, 1999.

c. The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123)

(9) The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measures and records the differential pressure between inside and outside of each permanent total enclosure whenever the emissions

unit controlled by the permanent total enclosure is in operation and employing solvent-based coatings. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

e) Reporting Requirements

(1) In lieu of the applicable reporting requirements in OAC rule 3745-21-09(B)(3), the permittee shall submit quarterly deviation (excursion) reports that identify any daily record that demonstrates a failure to comply with the daily allowable VOC emission limitation calculated each day in accordance with the equation specified in section d)(2).

If no excursions occur during a calendar quarter, the permittee shall submit a report stating such.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

(2) The Permittee shall submit quarterly deviation (excursion) reports that identify the duration and cause of any excursion for:

a. All 3-hour blocks of time when the emissions units controlled by the solvent recovery system were in operation during which the average VOC concentration of the exhaust gases from the solvent recovery system exceeded the concentration limitation specified in section c)(1).

b. All 3-hour blocks of time when the emissions units controlled by the catalytic oxidation system were in operation during which the average temperature of the exhaust gases immediately before any catalyst bed does not comply with the temperature limitation specified in section c)(2).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123)

(3) Each quarterly deviation report also shall include the total 12-month VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

If no excursions occur during a calendar quarter, the permittee shall submit a report stating such, along with the total 12-month VOC emissions from emissions unit K009, in tons, through that quarter for which the report is submitted.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which a permanent total enclosure was not maintained at the required differential pressure specified in section c)(4) for more than five minutes and solvent-based coating is being applied.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 52.1870(c)(123))

(4) The permittee shall submit an annual report that includes:

a. The results of the annual catalyst activity tests required in section d)(8). This annual report shall be submitted within 45 days after each catalyst activity test is performed.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123)

(5) The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

f) Testing Requirements

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

a. Emission Limitation:

facility-wide daily allowable VOC emission limitation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections d)(2) and d)(3).

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

b. Emission Limitation:

62.5 tpy of VOC K009

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

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

(2) Catalytic Oxidizers - Performance test.

a. Emission testing shall be conducted at least once every five years to determine the control efficiency of the catalytic oxidizers (last tested on 4/06). The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C) or such alternatives approved by USEPA. 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.

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

c. Test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 45 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

(3) The percent overall VOC emission reduction of the solvent recovery system shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 60.443 with a rolling, 7-day average, as specified in conditions d)(3) and d)(6).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

(4) All testing must follow the requirements of OAC rule 3745-21-10(A).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 52.1870(c)(123))

g) Miscellaneous Requirements

(1) None.