



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

04/30/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

08-55-14-0077

Troy Laminating and Coating, Inc.
JIM EDWARDS
421 S. UNION ST.
TROY, OH 45373-0421

Dear JIM EDWARDS:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact RAPCA.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: RAPCA
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 04/30/02	Effective Date: 04/30/02	Expiration Date: 04/30/07
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This document constitutes issuance of a Title V permit for Facility ID: 08-55-14-0077 to:
 Troy Laminating and Coating, Inc.
 421 S. UNION ST.
 TROY, OH 45373-0421

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (#8 COATER) #8 COATER	K005 (#16 COATER) #16 COATER	P013 (DRUM MIXER) COATING MIXER
K002 (#9 LAMINATOR) #9 LAMINATOR	K007 (#18 COATER) #18 COATER	P014 (COATING MIX TANK #6) ADHESIVE COATING MIXER
K003 (#12 LAMINATOR) #12 LAMINATOR	P002 (BALL MILLS) BALL MILLS	
K004 (#11 COATER) #11 COATER	P011 (LACQUER MIXER) COATING MIXER	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

RAPCA
 451 West Third Street
 PO Box 972
 Dayton, OH 45422
 (937) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **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, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, 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 taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.6 below if no deviations occurred during the quarter.

- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- (Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- iv. 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 are true, accurate, and complete.
- (Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

2. 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, i.e., upset condition, of any emissions unit(s) 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

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

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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

4. 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))

5. 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))

6. 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 A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. 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))

11. 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))

12. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. 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.
- iii. 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))

13. 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))

14. 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))

15. 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))

16. 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 emission 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; and
- 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

17. 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.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

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

19. 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))

20. 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))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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 (a) 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, (b) the probable cause of such deviations, and (c) 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. 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 quarterly, i.e., 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.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

B007 #7 Boiler
B008 #6 Boiler
B009 #4 Boiler
B010 #5 Boiler
K008 #1 Gummer
P009 Jaygo Dissolver
P010 Cowles Dissolver
P012 Bucket Mixer
T001 #1 Solvent Storage
T002 #2 Solvent Storage
T003 #3 Solvent Storage
Z001 Box Shop
Z002 Lab Hoods
Z003 Parts Washer
Z004 Breakers
Z005 Glue Mix Room
Z006 Lacquer Storage Room
Z009 Lacquer Mix Room

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.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #8 COATER (K001)

Activity Description: #8 COATER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paper Coating Line #8, with thermal incinerator or carbon adsorption	OAC rule 3745-21-09(F)	EITHER less than or equal to 2.9 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents; OR IN THE ALTERNATIVE
	OAC rule 3745-21-09 (B)(6)	minimum 81% overall VOC reduction from the coating line and either a minimum 90% destruction efficiency for the thermal incinerator; or minimum 90% removal efficiency for the carbon adsorption system

2. Additional Terms and Conditions

None

II. Operational Restrictions

- When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The average temperature of the combustion chamber within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent emission testing that demonstrated compliance was conducted on January 21, 1998 with an average combustion chamber temperature of 1529 degrees Fahrenheit. The combustion chamber temperature reference is subject to revision, if during the term of this permit, additional emission testings are conducted that demonstrated the unit is in compliance.]

II. Operational Restrictions (continued)

2. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time when the emissions unit is in operation, shall not exceed a VOC concentration (ppm) that is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance, adjusted to a destruction efficiency of 97% using the following equation:

$$CC = 0.03 \times TC / (1 - TE)$$

where,

CC = the allowable concentration, in ppm, adjusted to a 97% percent removal efficiency

TC = the exhaust gas concentration of VOC, in ppm, measured during the most recent emission testing

TE = the destruction efficiency measured during the most recent emission testing

III. Monitoring and/or Record Keeping Requirements

1. When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation and venting the VOC emissions to the thermal incinerator. 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day the VOC emissions are vented to the thermal incinerator:

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

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. [The most recent emission test that demonstrated compliance was January 21, 1998; the average combustion chamber temperature was 1529 degrees Fahrenheit.]

3. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The permittee shall operate and maintain a continuous organic monitoring device and recorder that measures and records the VOC concentrations in the exhaust gases of the carbon adsorber when the emissions unit is in operation and venting the VOC emissions to the carbon adsorber. 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 the initial 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall demonstrate compliance with Performance Specification 8 or Performance Specification 9 mentioned above within 4 months of the effective date of this permit.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information for each day the VOC emissions are vented to the carbon adsorber:
 - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated the emissions unit was in compliance.
5. A statement of certification of the existing continuous volatile organic compound monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
6. When the Emissions Unit is Operating and NOT Venting to a Control Device:

The permittee shall collect and record the following information for each day or portion of a day any of the VOC emissions are not vented to a control device:

 - a. The name and identification number of each coating not vented to a control device, as applied.
 - b. The VOC content of each coating (in pounds/gallon, excluding water and exempt solvents) not vented to a control device, as applied.

IV. Reporting Requirements

1. For Periods When the Emissions Unit was Operating and Venting to the Thermal Incinerator:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated compliance.
2. For Periods When the Emissions Unit was Operating and Venting to the Carbon Adsorber:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time [when the emissions unit was in operation and venting the VOC emissions to the carbon adsorber] during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated that the emissions unit was in compliance.
3. For Periods When the Emissions Unit was Operating and NOT Venting to a Control Device:

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content) that were not vented to a control device. 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.

IV. Reporting Requirements (continued)

4. These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, of the General Terms and Conditions of this permit.
5. The quarterly summaries shall be submitted by January 31, April 31, July 31 and October 31 and shall cover the records for the previous calendar quarter.

V. Testing Requirements

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

- 1.a Emissions Limitation -
2.9 lbs VOC/gallon, excluding water and exempt solvents, when not employing a control system

Applicable Compliance Method -

The permittee shall demonstrate compliance based upon the record keeping requirements specified in section A.III.6 of this permit.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

- 1.b Emission Limitation-
minimum 81% overall VOC reduction (from the coating line) and either a minimum 90% destruction efficiency when VOC emissions are vented to the thermal incinerator or a minimum 90% removal efficiency when VOC emissions are vented to carbon adsorber

Applicable Compliance Method-

Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in section A.V.2 of this permit.

2. Emission Testing Requirement:

Within six months prior to the expiration of this permit, the permittee shall conduct, or have conducted, performance testing (with carbon adsorption and with thermal oxidation) on the air contaminant emissions unit in order to demonstrate compliance with the overall control system efficiency for VOCs which will be determined as the product of the capture efficiency and either the destruction (thermal incinerator) or removal (carbon adsorber) efficiency. The capture efficiency will be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement. The vapor destruction (thermal incinerator) and removal (carbon adsorber) efficiencies shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds or organic materials between the inlet and outlet of the vapor control systems. The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Use of analytical methods not specified in OAC rule 3745-21-10 shall be approved by the Administrator on a case-by-case basis. The permittee shall submit sufficient documentation for the Administrator to determine if an adaptation of the reference method or use of an alternative method is appropriate.

V. Testing Requirements (continued)

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

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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous volatile organic compound monitoring system designed to ensure continuous valid and representative readings of volatile organic compounds. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous volatile organic compound monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #9 LAMINATOR (K002)

Activity Description: #9 LAMINATOR

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Laminator #9, with thermal incinerator or carbon adsorption	OAC rule 3745-21-09(F)	EITHER less than or equal to 2.9 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents; OR IN THE ALTERNATIVE
	OAC rule 3745-21-09 (B)(6)	minimum 81% overall VOC reduction from the coating line and either a minimum 90% destruction efficiency for the thermal incinerator; or minimum 90% removal efficiency for the carbon adsorption system

2. Additional Terms and Conditions

- 2.a No printing, as defined in OAC rule 3745-21-01(D), is performed in this emissions unit.

II. Operational Restrictions

1. When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The average temperature of the combustion chamber within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent emission testing that demonstrated compliance was conducted on January 21, 1998 with an average combustion chamber temperature of 1529 degrees Fahrenheit. The combustion chamber temperature reference is subject to revision, if during the term of this permit, additional emission testings are conducted that demonstrated the unit is in compliance.]

II. Operational Restrictions (continued)

2. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time when the emissions unit is in operation, shall not exceed a VOC concentration (ppm) that is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance, adjusted to a destruction efficiency of 97% using the following equation:

$$CC = 0.03 \times TC / (1 - TE)$$

where,

CC = the allowable concentration, in ppm, adjusted to a 97% percent removal efficiency

TC = the exhaust gas concentration of VOC, in ppm, measured during the most recent emission testing

TE = the destruction efficiency measured during the most recent emission testing

III. Monitoring and/or Record Keeping Requirements

1. When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation and venting the VOC emissions to the thermal incinerator. 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day the VOC emissions are vented to the thermal incinerator:

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

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. [The most recent emission test that demonstrated compliance was January 21, 1998; the average combustion chamber temperature was 1529 degrees Fahrenheit.]

3. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The permittee shall operate and maintain a continuous organic monitoring device and recorder that measures and records the VOC concentrations in the exhaust gases of the carbon adsorber when the emissions unit is in operation and venting the VOC emissions to the carbon adsorber. 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 the initial 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall demonstrate compliance with Performance Specification 8 or Performance Specification 9 mentioned above within 4 months of the effective date of this permit.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information for each day the VOC emissions are vented to the carbon adsorber:
 - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated the emissions unit was in compliance.
5. A statement of certification of the existing continuous volatile organic compound monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
6. When the Emissions Unit is Operating and NOT Venting to a Control Device:

The permittee shall collect and record the following information for each day or portion of a day any of the VOC emissions are not vented to a control device:

 - a. The name and identification number of each coating not vented to a control device, as applied.
 - b. The VOC content of each coating (in pounds/gallon, excluding water and exempt solvents) not vented to a control device, as applied.

IV. Reporting Requirements

1. For Periods When the Emissions Unit was Operating and Venting to the Thermal Incinerator:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated compliance.
2. For Periods When the Emissions Unit was Operating and Venting to the Carbon Adsorber:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time [when the emissions unit was in operation and venting the VOC emissions to the carbon adsorber] during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated that the emissions unit was in compliance.
3. For Periods When the Emissions Unit was Operating and NOT Venting to a Control Device:

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content) that were not vented to a control device. 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.

IV. Reporting Requirements (continued)

4. These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, of the General Terms and Conditions of this permit.
5. The quarterly summaries shall be submitted by January 31, April 31, July 31 and October 31 and shall cover the records for the previous calendar quarter.

V. Testing Requirements

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

- 1.a Emissions Limitation -
2.9 lbs VOC/gallon, excluding water and exempt solvents, when not employing a control system

Applicable Compliance Method -

The permittee shall demonstrate compliance based upon the record keeping requirements specified in section A.III.6 of this permit.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

- 1.b Emission Limitation-
minimum 81% overall VOC reduction (from the coating line) and either a minimum 90% destruction efficiency when VOC emissions are vented to the thermal incinerator or a minimum 90% removal efficiency when VOC emissions are vented to carbon adsorber

Applicable Compliance Method-

Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in section A.V.2 of this permit.

2. Emission Testing Requirement:

Within six months prior to the expiration of this permit, the permittee shall conduct, or have conducted, performance testing (with carbon adsorption and with thermal oxidation) on the air contaminant emissions unit in order to demonstrate compliance with the overall control system efficiency for VOCs which will be determined as the product of the capture efficiency and either the destruction (thermal incinerator) or removal (carbon adsorber) efficiency. The capture efficiency will be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement. The vapor destruction (thermal incinerator) and removal (carbon adsorber) efficiencies shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds or organic materials between the inlet and outlet of the vapor control systems. The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Use of analytical methods not specified in OAC rule 3745-21-10 shall be approved by the Administrator on a case-by-case basis. The permittee shall submit sufficient documentation for the Administrator to determine if an adaptation of the reference method or use of an alternative method is appropriate.

V. Testing Requirements (continued)

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

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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous volatile organic compound monitoring system designed to ensure continuous valid and representative readings of volatile organic compounds. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous volatile organic compound monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #12 LAMINATOR (K003)

Activity Description: #12 LAMINATOR

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Laminator #12, with thermal incinerator or carbon adsorption	OAC rule 3745-21-09(F)	EITHER less than or equal to 2.9 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents; OR IN THE ALTERNATIVE
	OAC rule 3745-21-09 (B)(6)	minimum 81% overall VOC reduction from the coating line and either a minimum 90% destruction efficiency for the thermal incinerator; or minimum 90% removal efficiency for the carbon adsorption system

2. Additional Terms and Conditions

None

II. Operational Restrictions

- When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The average temperature of the combustion chamber within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent emission testing that demonstrated compliance was conducted on January 21, 1998 with an average combustion chamber temperature of 1529 degrees Fahrenheit. The combustion chamber temperature reference is subject to revision, if during the term of this permit, additional emission testings are conducted that demonstrated the unit is in compliance.]

II. Operational Restrictions (continued)

2. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time when the emissions unit is in operation, shall not exceed a VOC concentration (ppm) that is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance, adjusted to a destruction efficiency of 97% using the following equation:

$$CC = 0.03 \times TC / (1 - TE)$$

where,

CC = the allowable concentration, in ppm, adjusted to a 97% percent removal efficiency

TC = the exhaust gas concentration of VOC, in ppm, measured during the most recent emission testing

TE = the destruction efficiency measured during the most recent emission testing

III. Monitoring and/or Record Keeping Requirements

1. When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation and venting the VOC emissions to the thermal incinerator. 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day the VOC emissions are vented to the thermal incinerator:

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

- b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. [The most recent emission test that demonstrated compliance was January 21, 1998; the average combustion chamber temperature was 1529 degrees Fahrenheit.]

3. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The permittee shall operate and maintain a continuous organic monitoring device and recorder that measures and records the VOC concentrations in the exhaust gases of the carbon adsorber when the emissions unit is in operation and venting the VOC emissions to the carbon adsorber. 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 the initial 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall demonstrate compliance with Performance Specification 8 or Performance Specification 9 mentioned above within 4 months of the effective date of this permit.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information for each day the VOC emissions are vented to the carbon adsorber:
 - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated the emissions unit was in compliance.
5. A statement of certification of the existing continuous volatile organic compound monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
6. When the Emissions Unit is Operating and NOT Venting to a Control Device:

The permittee shall collect and record the following information for each day or portion of a day any of the VOC emissions are not vented to a control device:

 - a. The name and identification number of each coating not vented to a control device, as applied.
 - b. The VOC content of each coating (in pounds/gallon, excluding water and exempt solvents) not vented to a control device, as applied.

IV. Reporting Requirements

1. For Periods When the Emissions Unit was Operating and Venting to the Thermal Incinerator:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated compliance.
2. For Periods When the Emissions Unit was Operating and Venting to the Carbon Adsorber:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time [when the emissions unit was in operation and venting the VOC emissions to the carbon adsorber] during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated that the emissions unit was in compliance.
3. For Periods When the Emissions Unit was Operating and NOT Venting to a Control Device:

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content) that were not vented to a control device. 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.

IV. Reporting Requirements (continued)

4. These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, of the General Terms and Conditions of this permit.
5. The quarterly summaries shall be submitted by January 31, April 31, July 31 and October 31 and shall cover the records for the previous calendar quarter.

V. Testing Requirements

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

- 1.a Emissions Limitation -
2.9 lbs VOC/gallon, excluding water and exempt solvents, when not employing a control system

Applicable Compliance Method -

The permittee shall demonstrate compliance based upon the record keeping requirements specified in section A.III.6 of this permit.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

- 1.b Emission Limitation-
minimum 81% overall VOC reduction (from the coating line) and either a minimum 90% destruction efficiency when VOC emissions are vented to the thermal incinerator or a minimum 90% removal efficiency when VOC emissions are vented to carbon adsorber

Applicable Compliance Method-

Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in section A.V.2 of this permit.

2. Emission Testing Requirement:

Within six months prior to the expiration of this permit, the permittee shall conduct, or have conducted, performance testing (with carbon adsorption and with thermal oxidation) on the air contaminant emissions unit in order to demonstrate compliance with the overall control system efficiency for VOCs which will be determined as the product of the capture efficiency and either the destruction (thermal incinerator) or removal (carbon adsorber) efficiency. The capture efficiency will be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement. The vapor destruction (thermal incinerator) and removal (carbon adsorber) efficiencies shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds or organic materials between the inlet and outlet of the vapor control systems. The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Use of analytical methods not specified in OAC rule 3745-21-10 shall be approved by the Administrator on a case-by-case basis. The permittee shall submit sufficient documentation for the Administrator to determine if an adaptation of the reference method or use of an alternative method is appropriate.

V. Testing Requirements (continued)

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

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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous volatile organic compound monitoring system designed to ensure continuous valid and representative readings of volatile organic compounds. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous volatile organic compound monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #11 COATER (K004)

Activity Description: #11 COATER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coater #11, with flexographic printing	OAC rule 3745-21-09(Y)(1) 40 CFR, Part 63, Subpart KK	40% VOC by volume of the coating and ink, excluding water; or 25% VOC by volume of the volatile matter in the coating and ink See A.II.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum amount of organic hazardous air pollutants (HAP) employed in this emissions unit each month for flexographic printing shall not exceed 400 kilograms (kgs).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating and ink, as applied.
 - b. The VOC content of each coating and ink used in this emissions unit, as applied, in percent by volume of the coating and ink, excluding water, and in percent by volume of the volatile matter in the coating and ink.
2. The permittee shall record and maintain monthly records of the following for each material employed for flexographic printing in this emissions unit:
 - a. the total volume, in gallons, of each material employed;
 - b. the organic HAP content, in pounds/gallon, of each material employed;
 - c. the organic HAP emissions, in kgs, of each material employed; and
 - d. the organic HAP emissions, in kgs, from all the materials employed.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and inks in this emissions unit (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly organic HAP usage restriction (for flexographic printing) of 400 kgs. These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, of the General terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitations -
40% VOC by volume of the coating and ink, excluding water; or 25% VOC by volume of the volatile matter in the coating and ink

Applicable Compliance Method -

The permittee shall demonstrate compliance based upon the record keeping requirements specified in section A.III.1 of this permit.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- 1.b Emission Limitation -
400 kgs organic HAP/month

Applicable Compliance Method -

The permittee shall demonstrate compliance based upon the record keeping requirements specified in section A.III.2 of this permit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #16 COATER (K005)

Activity Description: #16 COATER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coater #16, with thermal incinerator or carbon adsorber	OAC rule 3745-31-05(A)(3) PTI 08-210	2750 lbs volatile organic compounds (VOC)/day 97.0 tons/year VOC The requirements of this rule also includes compliance with the requirements of OAC rules 3745-21-09(F) and 3745-21-09(B)(6).
	OAC rule 3745-21-09(F)	EITHER less than or equal to 2.9 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents; OR IN THE ALTERNATIVE
	OAC rule 3745-21-09 (B)(6)	minimum 81% overall VOC reduction from the coating line and either a minimum 90% destruction efficiency for the thermal incinerator; or minimum 90% removal efficiency for the carbon adsorption system

2. Additional Terms and Conditions

None

II. Operational Restrictions

- When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The average temperature of the combustion chamber within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent emission testing that demonstrated compliance was conducted on January 21, 1998 with an average combustion chamber temperature of 1529 degrees Fahrenheit. The combustion chamber temperature reference is subject to revision, if during the term of this permit, additional emission testings are conducted that demonstrated the unit is in compliance.]

II. Operational Restrictions (continued)

2. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time when the emissions unit is in operation, shall not exceed a VOC concentration (ppm) that is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance, adjusted to a destruction efficiency of 97% using the following equation:

$$CC = 0.03 \times TC / (1 - TE)$$

where,

CC = the allowable concentration, in ppm, adjusted to a 97% percent removal efficiency

TC = the exhaust gas concentration of VOC, in ppm, measured during the most recent emission testing

TE = the destruction efficiency measured during the most recent emission testing

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that list the following information for this emissions unit:

- a. The company identification of each surface coating employed.
- b. The number of gallons of each surface coating employed.
- c. The VOC content for each surface coating employed, in pounds per gallon.
- d. The uncontrolled VOC emission rate from each surface coating employed, in pounds.
- e. The total uncontrolled VOC emission rate from all the surface coatings vented to the thermal incinerator, in pounds.
- f. The total uncontrolled VOC emission rate from all the surface coatings vented to the carbon adsorber, in pounds.
- g. The total VOC emission rate from all the surface coatings vented directly to the atmosphere, in pounds.
- h. The total controlled VOC emission rate from all the surface coatings vented to the thermal incinerator, in pounds, i.e., the value from (e) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance. (Until additional emission tests are conducted, an average overall control efficiency of 94.9% (0.949) shall be used in this calculation.)
- i. The total controlled VOC emission rate from all the surface coatings vented to the carbon adsorber, in pounds, i.e., the value from (f) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance. (Until additional emission tests are conducted, an average overall control efficiency of 93.8% (0.938) shall be used in this calculation.)
- j. The total actual VOC emission rate from all the surface coatings employed, in pounds (i.e., the sum of (g), (h), and (i) above).

2. When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation and venting the VOC emissions to the thermal incinerator. 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each day the VOC emissions are vented to the thermal incinerator:
 - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. [The most recent emission test that demonstrated compliance was January 21, 1998; the average combustion chamber temperature was 1529 degrees Fahrenheit.]
4. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The permittee shall operate and maintain a continuous organic monitoring device and recorder that measures and records the VOC concentrations in the exhaust gases of the carbon adsorber when the emissions unit is in operation and venting the VOC emissions to the carbon adsorber. 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 the initial 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall demonstrate compliance with Performance Specification 8 or Performance Specification 9 mentioned above within 4 months of the effective date of this permit.
5. The permittee shall collect and record the following information for each day the VOC emissions are vented to the carbon adsorber:
 - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated the emissions unit was in compliance.
6. A statement of certification of the existing continuous volatile organic compound monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
7. When the Emissions Unit is Operating and NOT Venting to a Control Device:

The permittee shall collect and record the following information for each day or portion of a day any of the VOC emissions are not vented to a control device:

 - a. The name and identification number of each coating not vented to a control device, as applied.
 - b. The VOC content of each coating (in pounds/gallon, excluding water and exempt solvents) not vented to a control device, as applied.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily VOC emission limitation of 2750 pounds.
2. The permittee shall submit semi-annual reports that specify the total VOC emissions from this emissions unit for the previous six calendar months. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year.

IV. Reporting Requirements (continued)

- 3.** For Periods When the Emissions Unit was Operating and Venting to the Thermal Incinerator:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated compliance.
- 4.** For Periods When the Emissions Unit was Operating and NOT Venting to a Control Device:

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content) that were not vented to a control device. 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.
- 5.** For Periods When the Emissions Unit was Operating and Venting to the Carbon Adsorber:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time [when the emissions unit was in operation and venting the VOC emissions to the carbon adsorber] during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated that the emissions unit was in compliance.
- 6.** These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, of the General Terms and Conditions of this permit.
- 7.** The quarterly summaries shall be submitted by January 31, April 31, July 31 and October 31 and shall cover the records for the previous calendar quarter.

V. Testing Requirements

- 1.** Compliance with the emission limitations in Section A. I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a** Emission Limitation -
2750 lbs/day VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.
 - 1.b** Emission Limitation -
97.0 tons/year VOC

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit and shall be the sum of the daily VOC emissions for the calendar year, divided by 2,000.

V. Testing Requirements (continued)

- 1.c** Emission Limitation-
minimum 81% overall VOC reduction (from the coating line) and either a minimum 90% destruction efficiency when VOC emissions are vented to the thermal incinerator or a minimum 90% removal efficiency when VOC emissions are vented to carbon adsorber

Applicable Compliance Method-

Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in section A.V.2 of this permit.

- 1.d** Emissions Limitation -
2.9 lbs VOC/gallon, excluding water and exempt solvents, when not employing a control system

Applicable Compliance Method -

The permittee shall demonstrate compliance based upon the record keeping requirements specified in section A.III.7 of this permit.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

2. Emission Testing Requirement:

Within six months prior to the expiration of this permit, the permittee shall conduct, or have conducted, performance testing (with carbon adsorption and with thermal oxidation) on the air contaminant emissions unit in order to demonstrate compliance with the overall control system efficiency for VOCs which will be determined as the product of the capture efficiency and either the destruction (thermal incinerator) or removal (carbon adsorber) efficiency. The capture efficiency will be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement. The vapor destruction (thermal incinerator) and removal (carbon adsorber) efficiencies shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds or organic materials between the inlet and outlet of the vapor control systems. The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Use of analytical methods not specified in OAC rule 3745-21-10 shall be approved by the Administrator on a case-by-case basis. The permittee shall submit sufficient documentation for the Administrator to determine if an adaptation of the reference method or use of an alternative method is appropriate.

V. Testing Requirements (continued)

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

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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous volatile organic compound monitoring system designed to ensure continuous valid and representative readings of volatile organic compounds. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous volatile organic compound monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #18 COATER (K007)

Activity Description: #18 COATER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#18 aqueous/solvent-based coating line, with thermal incinerator or carbon adsorber	OAC rule 3745-31-05 PTI 08-1416	for coatings vented directly to the atmosphere, less than or equal to 1.0 lb volatile organic compounds (VOC)/gallon, excluding water and exempt solvents
		for coatings vented to the thermal oxidizer or the carbon adsorption system, 1.0 lb VOC/gallon, excluding water and exempt solvents, after application of emission controls (taking into account the control efficiency requirements in section A.I.2.a)
		See section A.I.2.
	OAC rule 3745-21-09(F)	72.2 lbs/hour and 77.9 tons/year VOC The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a A minimum 86% overall VOC reduction (from the coating line) and either a minimum 97% destruction efficiency for the thermal incinerator, or a minimum 97% removal efficiency for the carbon adsorption system shall be achieved in this emissions unit.
- 2.b The maximum monthly uncontrolled (prior to capture and control) VOC emission rate from this emissions unit shall not exceed 81,146 pounds.

II. Operational Restrictions

1. The permittee shall only use in this emissions unit coatings identified in permit to install (PTI) application No. 08-1416. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing fourteen (14) days prior to the use of any other type of coating than those identified in the PTI application No. 08-1416.

2. When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The average temperature of the combustion chamber within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. [The most recent emission testing that demonstrated compliance was conducted on January 21, 1998 with an average combustion chamber temperature of 1529 degrees Fahrenheit. The combustion chamber temperature reference is subject to revision, if during the term of this permit, additional emission testings are conducted that demonstrated the unit is in compliance.]

3. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time when the emissions unit is in operation, shall not exceed a VOC concentration (ppm) that is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance, adjusted to a destruction efficiency of 97% using the following equation:

$$CC = 0.03 \times TC / (1 - TE)$$

where,

CC = the allowable concentration, in ppm, adjusted to a 97% percent removal efficiency

TC = the exhaust gas concentration of VOC, in ppm, measured during the most recent emission testing

TE = the destruction efficiency measured during the most recent emission testing

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that list the following information for this emissions unit:
 - a. The company identification of each surface coating employed.
 - b. The number of gallons of each surface coating employed.
 - c. The VOC content for each surface coating employed, in pounds per gallon.
 - d. The VOC content, in pounds per gallon (excluding water and exempt solvents), of each surface coating vented directly to the atmosphere.
 - e. The uncontrolled VOC emission rate from each surface coating employed, in pounds.
 - f. The total uncontrolled VOC emission rate from all the surface coatings vented to the thermal incinerator, in pounds.
 - g. The total uncontrolled VOC emission rate from all the surface coatings vented to the carbon adsorber, in pounds.
 - h. The total VOC emission rate from all the surface coatings vented directly to the atmosphere, in pounds.
 - i. The total uncontrolled VOC emissions (prior to capture and control), in pounds, from all the surface coatings employed.
 - j. The total controlled VOC emission rate from all the surface coatings vented to the thermal incinerator, in pounds, i.e., the value from (e) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance. (Until additional emission tests are conducted, an average overall control efficiency of 88.7% (0.887) shall be used in this calculation.)
 - k. The number of gallons of coatings, excluding water and exempt solvents, for which the VOC emissions were vented to the thermal oxidizer.
 - l. The overall VOC content, in pounds per gallon (excluding water and exempt solvents), of the coatings for which the VOC emissions were vented to the thermal oxidizer (j/k).
 - m. The total controlled VOC emission rate from all the surface coatings vented to the carbon adsorber, in pounds, i.e., the value from (f) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance. (Until additional emission tests are conducted, an average overall control efficiency of 88.7% (0.887) shall be used in this calculation.)
 - n. The number of gallons of coatings, excluding water and exempt solvents, for which the VOC emissions were vented to the carbon adsorber.
 - o. The overall VOC content, in pounds per gallon (excluding water and exempt solvents), of the coatings for which the VOC emissions were vented to the carbon adsorber (m/n).
 - p. The total actual VOC emission rate from all the surface coatings employed, in pounds [i.e., the sum of (h), (j), and (m) above].
 - q. The number of hours the emissions unit was in operation.
 - r. The average hourly VOC emissions, i.e., (p)/(q), in pounds/hour (average).
2. The permittee shall maintain monthly records of the total uncontrolled VOC emissions (prior to capture and control), in pounds, from all the surface coatings employed [the total uncontrolled VOC emissions shall be the sum of the daily VOC emission rates (from A.III.1.i) for the calendar month].

III. Monitoring and/or Record Keeping Requirements (continued)

3. When the Emissions Unit is Operating and Venting to the Thermal Incinerator:

The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation and venting the VOC emissions to the thermal incinerator. 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations with any modifications deemed necessary by the permittee. The permittee shall demonstrate compliance with Performance Specification 8 or Performance Specification 9 mentioned above within 4 months of the effective date of this permit.

4. The permittee shall collect and record the following information for each day the VOC emissions are vented to the thermal incinerator:

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

b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. [The most recent emission test that demonstrated compliance was January 21, 1998; the average combustion chamber temperature was 1529 degrees Fahrenheit.]

5. When the Emissions Unit is Operating and Venting to the Carbon Adsorber:

The permittee shall operate and maintain a continuous organic monitoring device and recorder that measures and records the VOC concentrations in the exhaust gases of the carbon adsorber when the emissions unit is in operation and venting the VOC emissions to the carbon adsorber. 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 the initial 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 calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

6. The permittee shall collect and record the following information for each day the VOC emissions are vented to the carbon adsorber:

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

b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated the emissions unit was in compliance.

7. When the Emissions Unit is Operating and NOT Venting to a Control Device:

The permittee shall collect and record the following information for each day or portion of a day any of the VOC emissions are not vented to a control device:

a. The name and identification number of each coating not vented to a control device, as applied.

b. The VOC content of each coating (in pounds/gallon, excluding water and exempt solvents) not vented to a control device, as applied.

8. A statement of certification of the existing continuous volatile organic compound monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 8. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

IV. Reporting Requirements

1. For Periods When the Emissions Unit was Operating and Venting to the Thermal Incinerator:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated compliance.
 - c. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for the overall VOC content of the coatings for which the VOC emissions were vented to the thermal incinerator) . The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. For Periods When the Emissions Unit was Operating and Venting to the Carbon Adsorber:
 - a. The permittee shall submit to the Director (the appropriate Ohio EPA District Office or local air agency) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time [when the emissions unit was in operation and venting the VOC emissions to the carbon adsorber] during which the average VOC concentration in the exhaust gases was more than 20 percent greater than the average exhaust gas concentration measured by the monitoring device during the most recent performance test that demonstrated that the emissions unit was in compliance.
 - c. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for the overall VOC content of the coatings for which the VOC emissions were vented to the carbon adsorber) . 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.
3. For Periods When the Emissions Unit was Operating and NOT Venting to a Control Device:

The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content) that were not vented to a control device. 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.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly VOC emission limitation of 81,146 pounds and of the hourly VOC emission limitation of 72.2 pounds.
5. The permittee shall submit semi-annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) that summarize the following information for each coating employed in this emissions unit during the previous six calendar months:
 - a. the company identification of each surface coating;
 - b. the total number of gallons of each surface coating employed;
 - c. the VOC content of each surface coating employed (in pounds VOC per gallon of coating, excluding water and exempt solvents); and
 - d. the total VOC emissions from all the surface coatings employed, in tons.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months.

IV. Reporting Requirements (continued)

6. These quarterly deviation reports shall be submitted in accordance with paragraph A.1.c., Part I, of the General Terms and Conditions of this permit.
7. The quarterly summaries shall be submitted by January 31, April 31, July 31 and October 31 and shall cover the records for the previous calendar quarter.

V. Testing Requirements

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

- 1.a Emission Limitations -
less than or equal to 1.0 lb VOC/gallon, excluding water and exempt solvents, OR 1.0 lb VOC/gallon, excluding water and exempt solvents after application of emission control

Applicable Compliance Method -

The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping requirements in section A.III.1 of this permit.

USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. This analysis shall be performed during performance testing evaluations of the emissions unit.

- 1.b Emission Limitation -
72.2 lbs/hour VOC

Applicable Compliance Method -

Compliance shall be based upon the results of emission testing conducted in accordance with Methods 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A and the record keeping requirements in section A.III.1 of this permit.

- 1.c Emission Limitation-
minimum 86% overall VOC reduction from the coating line and either a minimum 97% destruction efficiency for the thermal incinerator; or a minimum 97% removal efficiency for the carbon adsorption system

Applicable Compliance Method-

Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in section A.V.2 of this permit.

- 1.d Emission Limitation -
77.9 tons/year VOC

Applicable Compliance Method -

Compliance shall be based on the record keeping requirements in section A.III.1 of this permit and shall be the sum of the daily controlled VOC emission rates from all the surface coatings for the calendar year, divided by 2,000.

- 1.e Emission Limitation -
81,146 pounds/month VOC

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in section A.III.2 of this permit.

V. Testing Requirements (continued)

2. Emission Testing Requirement:

Within six months prior to the expiration of this permit, the permittee shall conduct, or have conducted, performance testing (with carbon adsorption and with thermal oxidation) on the air contaminant emissions unit in order to demonstrate compliance with the overall control system efficiency for VOCs which will be determined as the product of the capture efficiency and either the destruction (thermal incinerator) or removal (carbon adsorber) efficiency. The capture efficiency will be determined using the test methods specified in 40 CFR, Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement. The vapor destruction (thermal incinerator) and removal (carbon adsorber) efficiencies shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds or organic materials between the inlet and outlet of the vapor control systems. The test method selected shall be based on consideration of the diversity of organic species present and their total concentration, and on consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Use of analytical methods not specified in OAC rule 3745-21-10 shall be approved by the Administrator on a case-by-case basis. The permittee shall submit sufficient documentation for the Administrator to determine if an adaptation of the reference method or use of an alternative method is appropriate.

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

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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous volatile organic compound monitoring system designed to ensure continuous valid and representative readings of volatile organic compounds. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous volatile organic compound monitoring system must be kept on site and available for inspection during regular office hours.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BALL MILLS (P002)

Activity Description: BALL MILLS

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
ball mills, with baghouse	OAC rule 3745-17-11(B)(1)	2.39 lbs/hour particulate emissions (PE)
	OAC rule 3745-21-07(G)(2)	8 lbs/hour, 40 lbs/day organic compounds (OC)
	OAC rule 3745-17-08	None, refer to section A.I.2.b of the terms and conditions of this permit.
	OAC rule 3745-17-07(B)	None, refer to section A.I.2.c of the terms and conditions of this permit.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

- 2.a The 8 lbs OC/hour limitation was developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limit.
- 2.b This emissions unit is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), OAC rule 3745-17-08 does not apply to this emissions unit.
- 2.c Because OAC rule 3745-17-08 is not applicable, this emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(d).

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 6 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

- a. The company identification for each coating mixed.
- b. The total amount of each coating mixed, in pounds.
- c. The total amount of all the coatings mixed, in pounds.
- d. The total organic compound emission rate from the coating mixing process, in pounds, calculated as follows:

total OC emissions (lbs/day) = [III.1.c, in pounds of coating mixed per day] X (an emission factor of 0.005 pound OC per pound of coating mixed)*

*this emission factor was developed by the permittee based upon mass balance calculations

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following:

- a. An identification of each day during which the organic compound emissions from the coating mix process exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
- b. An identification of all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

These deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation -
2.39 lbs/hour PE

Applicable Compliance Method -

Compliance may be determined by multiplying the maximum amount of pigment mixed in one hour (563 pounds) by an uncontrolled emission factor of 0.01 lb PE/lb pigment, as specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, section 6.4., Table 6.4-1. This uncontrolled emission rate is then multiplied by a fabric filter control efficiency of 99% (1 - 0.99) to obtain the actual controlled PE.

If required, compliance with the mass emission limitation above shall be demonstrated pursuant to the methods in OAC rule 3745-17-03(B)(10).

1.b Emission Limitation -
8 lbs/hour OC

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum pounds of coating mixed per hour by the company-developed mass balance emission factor of 0.005 pound OC per pound of coating mixed.

Facility Name: **Troy Laminating and Coating, Inc.**

Facility ID: **08-55-14-0077**

Emissions Unit: **BALL MILLS (P002)**

V. Testing Requirements (continued)

1.c Emission Limitation -
40 lbs/day OC

Applicable Compliance Method -

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

1.d Emission Limitation -

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method -

If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: LACQUER MIXER (P011)

Activity Description: COATING MIXER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
lacquer mixer, 150 gallons	OAC rule 3745-31-05(A)(3) PTI 08-3249	1.0 lb/hour, 24 lbs/day, and 4.38 tons/year organic compounds (OC)
	OAC rule 3745-17-08	None, refer to section A.I.2.b of the terms and conditions of this permit.
	OAC rule 3745-17-07(B)	None, refer to section A.I.2.c of the terms and conditions of this permit.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 1.0 lb OC/hour limitation is reflective of the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limit.
- 2.b This emissions unit is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), OAC rule 3745-17-08 does not apply to this emissions unit.
- 2.c Because OAC rule 3745-17-08 is not applicable, this emissions unit is exempt from the visible particulate emissions (PE) limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(d).

II. Operational Restrictions

1. This emissions unit shall be equipped with a cover or otherwise be enclosed to minimize evaporative losses.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating mixed.
 - b. The total amount of each coating mixed, in pounds.
 - c. The total amount of all the coatings mixed, in pounds.
 - d. The total organic compound emission rate from the coating mixing process, in pounds, calculated as follows:

total OC emissions (lbs/day) = [III.1.c, in pounds of coating mixed per day] X (an emission factor of 0.005 pound OC per pound of coating mixed)*

*this emission factor was developed by the permittee based upon mass balance calculations

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the organic compound emissions from the coating mix process exceeded 24 pounds per day, and the actual organic compound emissions for each such day. These deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation -
1.0 lb/hour OC

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum pounds of coating mixed per hour (200 pounds) by the company-developed mass balance emission factor of 0.005 pound OC per pound of coating mixed.

- 1.b Emission Limitation -
24 lbs/day OC

Applicable Compliance Method -

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

- 1.c Emission Limitation -
4.38 tons/year OC

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in section A.III.1 and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2000.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: DRUM MIXER (P013)

Activity Description: COATING MIXER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
drum mixer, 55 gallons	OAC rule 3745-31-05(A)(3) PTI 08-3249	1.0 lb/hour, 24 lbs/day, and 4.38 TPY organic compounds (OC)
	OAC rule 3745-17-08	None, refer to section A.1.2.b of the terms and conditions of this permit.
	OAC rule 3745-17-07(B)	None, refer to section A.1.2.c of the terms and conditions of this permit.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The 1.0 lb OC/hour limitation is reflective of the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limit.
- 2.b This emissions unit is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), OAC rule 3745-17-08 does not apply to this emissions unit.
- 2.c Because OAC rule 3745-17-08 is not applicable, this emissions unit is exempt from the visible particulate emissions (PE) limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(d).

II. Operational Restrictions

1. This emissions unit shall be equipped with a cover or otherwise be enclosed to minimize evaporative losses.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

- a. The company identification for each coating mixed.
- b. The total amount of each coating mixed, in pounds.
- c. The total amount of all the coatings mixed, in pounds.
- d. The total organic compound emission rate from the coating mixing process, in pounds, calculated as follows:

total OC emissions (lbs/day) = [III.1.c, in pounds of coating mixed per day] X (an emission factor of 0.005 pound OC per pound of coating mixed)*

*this emission factor was developed by the permittee based upon mass balance calculations

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the organic compound emissions from the coating mix process exceeded 24 pounds per day, and the actual organic compound emissions for each such day. These deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitation -
1.0 lb/hour OC

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum pounds of coating mixed per hour (200 pounds) by the company-developed mass balance emission factor of 0.005 pound OC per pound of coating mixed.

1.b Emission Limitation -
24 lbs/day OC

Applicable Compliance Method -

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

1.c Emission Limitation -
4.38 tons/year OC

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in section A.III.1 and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2000.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: COATING MIX TANK #6 (P014)

Activity Description: ADHESIVE COATING MIXER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coating mix tank #6, with thermal incinerator control	OAC rule 3745-31-05(A)(3) PTI 08-04264	minimum 92% overall organic compounds (OC) reduction (from the mixing operation) and a minimum 97% destruction efficiency for the thermal incinerator 42.12 lbs OC/day and 1.46 tons/year OC
	OAC rule 3745-21-07(G)(2) OAC rule 3745-21-07(G)(6)(a)	The emission control requirements specified by these rules are less stringent than the emission control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- The maximum daily coating mixed for this emissions unit shall not exceed 1640 gallons.
- The maximum annual coating mixed for this emissions unit shall not exceed 113,890 gallons.

III. Monitoring and/or Record Keeping Requirements

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

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each day for the control equipment:
 - a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
3. The permittee shall maintain daily records of the following information for this emissions unit:
 - a. The amount of coatings mixed, in gallons.
 - b. The organic compound emission rate (see calculation methodology in section A.V.1.b.), in pounds.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above.
 - b. All exceedances on the restriction of the daily amount of coatings mixed of 1640 gallons.
 - c. All exceedances of the daily OC emission limitation of 42.12 pounds.

These quarterly deviation reports shall be submitted in accordance with Section A.1.c. of the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that summarize the actual annual OC emissions and the actual annual number of gallons of coatings mixed. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation - minimum 92% overall OC reduction (from the mixing operation) and a minimum 97% destruction efficiency for the thermal incinerator

Applicable Compliance Method -

Compliance with the destruction efficiency shall be demonstrated in accordance with the test methods and procedures specified in OAC rule 3745-21-10. [Compliance with the destruction efficiency requirement was demonstrated during a performance test conducted on January 21, 1998 with an actual destruction efficiency of 99.9%.]

Compliance with the overall OC reduction limitation is presumed through the application of an enclosed mixing tank, which is inherent to the process, and venting the OC emissions to the thermal incinerator, operating at a minimum 97% destruction efficiency.

V. Testing Requirements (continued)

- 1.b** Emission Limitation -
42.12 lbs OC/day

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in section A.III.3 of this permit and shall be determined by multiplying the total gallons of coating mixed by the a company-developed emission factor of 0.321 lb OC/gallon coating mixed. This uncontrolled emission rate is then multiplied by the overall control efficiency determined during the most recent emission test that demonstrated the emissions unit was in compliance.

- 1.c** Emission Limitation -
1.46 TPY OC

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in section A.III.3 of this permit and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000.

- 1.d** Operational Limitation -
1640 gallons coating mixed/day

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in section A.III.3 of this permit.

- 1.e** Operational Limitation -
113,890 gallons coating mixed/year

Applicable Compliance Method -

Compliance shall be based upon record keeping requirements specified in section A.III.3 of this permit and shall be the sum of the daily amounts of coatings mixed for the calendar year.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coating mix tank #6, with thermal incinerator control	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (P014) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hour): 1.28 lbs/hour

Predicted 1-hour Maximum Ground-Level Concentration (ug/m3): 2102

MAGLC (ug/m3): 4,476.19

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy.":
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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