



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

**RE: FINAL PERMIT TO INSTALL
PORTAGE COUNTY
Application No: 16-02231**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 5/6/2003

The Duracote Corporation
Brian Miller
PO Box 1209 350 N Diamond St
Ravenna, OH 442561209

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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. 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

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

ARAQMD



**Permit To Install
Terms and Conditions**

**Issue Date: 5/6/2003
Effective Date: 5/6/2003**

FINAL PERMIT TO INSTALL 16-02231

Application Number: 16-02231

APS Premise Number: 1667060088

Permit Fee: **\$400**

Name of Facility: The Duracote Corporation

Person to Contact: Brian Miller

Address: PO Box 1209 350 N Diamond St
Ravenna, OH 442561209

Location of proposed air contaminant source(s) [emissions unit(s)]:

**350 N Diamond St
Ravenna, Ohio**

Description of proposed emissions unit(s):

Laminator.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

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.
- 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, 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.
- 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 of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - 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 made to the appropriate Ohio EPA District Office or local air agency. 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. See B.9 below if no deviations occurred during the quarter.

- 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. 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.
- 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.

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, 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. (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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

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.

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.

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.

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. 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.

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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
 - 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping of state-only enforceable 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 state-only required 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.)

3. Permit Transfers

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. 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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	39.99

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

According to the Title V permit that was issued on August 6, 1998, the following insignificant emission units are located at this facility:

B002 Cleaver Brooks boiler

B003 Cleaver Brooks boiler

B004 water tube heater

K005 laminator #1

Z001 gas oven

Z002 gas oven

Z003 gas oven

Z004 gas oven

Z005 gas oven

Z006 gas oven

Z007 gas oven

Z008 storage tank #1

Z009 storage tank #2

Z010 storage tank #3

Z011 storage tank #4

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 - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
K006 - Laminator No. 3 - flow coating solvent applications to laminate vinyl and fabrics, with indirect fired oven.	OAC rule 3745-31-05(A)(3)	See A.I.2.a and A.II.1 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1)(a), 3745-17-10(B)(1), 3745-21-09(G), 3745-21-09(H)(1)(a), and 3745-31-05(D).
	OAC rule 3745-31-05(D) Synthetic Minor to avoid a Major Modification at a Major Stationary Source pursuant to PSD regulations.	See A.I.2.b, A.II.2, and A.II.3 below.
	OAC rule 3745-17-07(A)(1)(a)	See A.I.2.c below.
	OAC rule 3745-17-10(B)(1)	See A.I.2.d below.
	OAC rule 3745-21-09(G)	See A.II.4 below.
	OAC rule 3745-21-09(H)(1)(a)	See A.I.2.e below.

2. Additional Terms and Conditions

- 2.a Volatile organic compound (VOC) emissions shall not exceed 29.0 pounds per hour and is based upon the solvent density value limitation listed in term A.II.4 and a maximum hourly gallon usage rate of 10. Since the VOC hourly mass emissions rate is based upon maximum conditions, therefore no record keeping and reporting requirements are required to show compliance with this limitation.
- 2.b The emissions of VOC from this emissions unit shall not exceed 39.99 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

- 2.c Visible emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
- 2.d Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
- 2.e The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-21-09(G).

II. Operational Restrictions

- 1. The permittee shall only burn natural gas as fuel in this emissions unit.
- 2. Based upon a maximum hourly gallon usage rate of 10 and the solvent density value listed in term A.II.4, the potential to emit for this emissions unit is 127.02 tons per year of VOC emissions. The current status of the Duracote Corporation for purposes of PSD major stationary source applicability before this permitting action based upon current federally enforceable air permits and calculated existing air contaminant sources that do not require air permits is considered a major stationary source.
- 3. The maximum annual operating hours for this emissions unit, when using solvent based coatings, shall not exceed 2758, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	229
1-2	458
1-3	687
1-4	916
1-5	1145
1-6	1347
1-7	1603
1-8	1832
1-9	2061

1-10	2290
1-11	2519
1-12	2758

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

4. Solvent density shall not exceed 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each month for the coating operation:
 - a. The name and identification number of each coating, as applied;
 - b. The number gallons of each coating, as applied;
 - c. The VOC content of each coating (excluding water and exempt solvents), as applied;
 - d. The total number of hours the emissions unit was in operation;
 - e. The amount of VOC emissions for each month;
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours; and
 - g. The rolling, 12-month summation of the VOC emissions.

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.

2. The permittee shall, on a weekly basis, visually inspect each stack during peak operating conditions and record whether or not any visible emissions are present.
3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

- a. The name and identification of each cleanup material employed;
- b. The number of gallons of each cleanup material employed;
- c. The VOC content of each cleanup material, in pounds per gallon; and
- d. The total VOC emissions from all coatings and cleanup materials, in pounds or tons.

IV. Reporting Requirements

1. 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. 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 after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a fuel other than natural gas is employed. The notification shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the use of the alternate fuel.
3. The permittee shall submit deviation (excursion) reports which include:
 - a. Identification of all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels; and
 - b. An identification of all exceedances of the rolling, 12 month VOC emissions limitation.

These deviation excursion reports are due by the date described in Part I of the General Terms and Conditions of this permit under section A.1.

4. The permittee shall submit semi-annual reports which include an identification of any weekly record showing that visible emissions were present. The reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6 calendar months.
5. The permittee shall submit annual reports which specify the VOC material usage, the VOC, in tons, and number of hours of operation for this emissions unit.

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:

- a. Emission Limitation:

The emissions of VOC from this emissions unit shall not exceed 39.99 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions.

Applicable Compliance Method:

To comply with the ton per year limitation, multiply the pound per hour limitation by the maximum operating hours of 2758 per year, and divide by the conversion factor of 2000 pounds per ton.

- b. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, compliance with this mass emission limitation shall be determined in accordance with the methods and procedures required by OAC rule 3745-17-03(B)(9).

2. Compliance with the operational restrictions in section A.II.4 of these terms and conditions shall be determined in accordance with the following methods:

Concentration Limitation:

Solvent density shall not exceed 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Monthly records shall be maintained of the VOC contents of all coatings employed, in accordance with A.III.1 above. The mass of volatile organic compounds per volume of each coating shall be determined in accordance with the procedures in OAC rule 3745-21-10(B). The VOC content of each coating shall be determined using USEPA Methods 24 and 24A. If pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24

or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
K006 - Laminator No. 3 - flow coating solvent applications to laminate vinyl and fabrics, with indirect fired oven.	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.