



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: DRAFT PERMIT TO INSTALL
LAKE COUNTY
Application No: 02-18741**

CERTIFIED MAIL

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

DATE: 3/16/2004

Avery Dennison Corp., Graphics Division
Kevin Cherney
250 Chester St
Painesville, OH 44077

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: USEPA

NEDO

PA

LAKE COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL 02-18741

FOR AN AIR CONTAMINANT SOURCE FOR AVERY DENNISON CORP., GRAPHICS DIVISION

On 3/16/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Avery Dennison Corp., Graphics Division**, located at **670 Hardy Rd., Building 11, Painesville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-18741:

Banner Line.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087 [(330)425-9171]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL

02-18741

Application Number: 02-18741

APS Premise Number: 0243001188

Permit Fee: **To be entered upon final issuance**

Name of Facility: Avery Dennison Corp., Graphics Division

Person to Contact: Kevin Cherney

Address: 250 Chester St
Painesville, OH 44077

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

**670 Hardy Rd., Building 11
Painesville, Ohio**

Description of proposed emissions unit(s):

Banner Line.

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 Recordkeeping 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 recordkeeping 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 recordkeeping 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, recordkeeping, 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 recordkeeping 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 recordkeeping 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

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.

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 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.

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	2.0 TPY

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

None

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>
K004 - Banner coating line to coat fabric and then laminate it between sheets of vinyl film equipped with an infrared oven, an electric hot oil heated roll curing station, with a gravure print station with a UV oven, all venting into the building	OAC rule 3745-31-05(A)	VOC emissions from this emissions unit, including cleanup, shall not exceed 0.45 pound per hour, on an average daily basis, and 2.0 tons per year.
	OAC rule 3745-21-09(G)	The VOC content for the coatings employed in this emissions unit shall not exceed of 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvent.
	OAC rule 3745-21-09(Y)	For all inks and coatings employed at the print station of this emissions unit, the VOC content of the coatings and inks shall not exceed forty percent by volume, of that coating and ink, excluding water and exempt solvents or twenty-five percent VOC, by volume, of the volatile matter in the coating and ink.
	40 CFR Part 63, Subpart KK (National Emission Standards for the Printing and Publishing Industry)	Exempt by 40 CFR Subpart KK, Section 63.821(a)(2)(ii)(A). See Section A.II.1. of the terms and conditions of this permit.
40 CFR Part 63, Subpart OOOO (National Emission Standards for the Printing, Coating, and Dyeing of Fabrics and Other Textiles Industry)	Exempt by 40 CFR Subpart OOOO , Section 63.4281(c). See Section A.II.2. of the terms and conditions of this permit.	

2. Additional Terms and Conditions

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

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

II. Operational Restrictions

1. The permittee shall operate this emissions unit(the gravure print station) such that the sum of total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other material applied at product and packaging rotogravure work stations, including all inboard and outboard stations, in each month never exceeds five weight-percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied at all coating stations in the emissions unit in that month, as described in Section 63.821(A).
2. The permittee shall employ fabric coatings in the emissions unit that contain "no organic HAPS", as defined in 40 CFR Part 63 Subpart OOOO, Section 63.4371 of the fabric coating MACT.

III. Monitoring and/or Recordkeeping Requirements

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

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

- a. the total mass of all materials including inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers applied at product and packaging rotogravure work stations in each month, including all indoor and outboard stations;
 - b. the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers applied in all coating stations in the emissions unit each month;
 - c. the ratio of total mass of all materials applied by the printing operation using product packaging rotogravure or wide web flexographic compared to the total mass of all materials used in the emissions unit, that is, $a/b \times 100 \%$; and
 - d. confirmation that this coater is "stand alone coating equipment" as defined by the rule.
2. Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.
 3. The permittee shall collect and record the following information daily for all coatings and inks employed in this emissions unit:

- a. the name and identification number of each coating and ink employed or applied;
 - b. for coatings that are not subject to OAC rule 3745-21-09(Y)(1), the VOC content, in pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents; and
 - c. for coatings and inks that are subject to OAC rule 3745-21-09(Y)(1), the percent VOC by volume of the coating or ink, excluding water and exempt solvents, and the percent VOC by volume of the volatile matter in the coating or ink.
4. The permittee shall collect and record the following information daily for all coatings and inks employed in this emissions unit:
- a. the total VOC emissions from the print station, in lbs;
 - b. the total VOC emission from cleanup of the print station, in lbs;
 - c. the total VOC emission from cleanup of the fabric coating line, in lbs;
 - d. the total VOC emissions from this emission unit, in lbs and tons;
 - e. the total operating hours of the emissions unit;
 - f. the daily average emissions of VOC, including cleanup from the emissions unit, in lbs per hour; and
5. The permittee shall record and sum total annual VOC emissions in tons per year from this emissions unit.
6. The permittee shall record any instance where fabric coatings used in the emissions unit contained "organic HAPS".

IV. Reporting Requirements

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

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

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

excluding water and exempt solvents, and 25% VOC by volume of the volatile matter in the coating or ink.

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

3. The permittee shall notify the Director (the Northeast District of the Ohio EPA) in writing of any daily record showing that the emission rate of VOCs, including cleanup, on an average daily basis, exceeded the applicable limitation of 0.45 lb per hour.

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

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the 5% limit (the ratio of the total mass of all materials applied by the printing operation using product and packaging rotogravure work stations or wide web flexographic, including all inboard and outboard stations, compared to the total mass of all materials applied in the emissions unit). This 5% limit exempts this printing operation from the requirements of the MACT standard as described in 40 CFR Part 63, Subpart KK, Section 63.821(a)(2)(ii)(A).
5. The permittee shall report any instance where fabric coatings used in the emissions unit contained "organic HAPS".

V. Testing Requirements

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

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

2. Emission Limitation

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

Applicable Compliance Method

Compliance with the above emission limitation shall be based on the record keeping in Section A.III.3 of these terms and conditions.

3. Emission Limitation

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

Applicable Compliance Method

Compliance with the above emission limitation shall be based on the record keeping in Section A.III.3 of these terms and conditions.

4. Emission Limitation

VOC emissions from this emissions unit, including cleanup, shall not exceed 0.45 pound per hour, on an average daily basis, and 2.0 tons per year.

Applicable Compliance Method

Compliance will be determined based on the record keeping in Section III.4 and 5 of these terms and conditions.

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>
K004 - Banner coating line to coat fabric and then laminate it between sheets of vinyl film equipped with a gravure print station venting into the building	OAC rule 3745-31-05	LIMIT(s)

2. Additional Terms and Conditions

2.a none

II. Operational Restrictions

none

III. Monitoring and/or Recordkeeping Requirements

none

IV. Reporting Requirements

none

V. Testing Requirements

none

VI. Miscellaneous Requirements

none