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
LAKE COUNTY
Application No: 02-14471
Fac ID: 0243110099

DATE: 12/23/2004

CERTIFIED MAIL

Y	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
Paper Coating	MACT
40 CFR Part 60 Subpart RR	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Avery Dennison, Painesville Fasson Films
Ferris Callahan
215 Chester St
Painesville, OH 44077-4117

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA NEDO

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 12/23/2004**
Terms and Conditions	**Effective Date: 12/23/2004**

FINAL PERMIT TO INSTALL 02-14471

Application Number: 02-14471

Facility ID: 0243110099

Permit Fee: **$200**

Name of Facility: Avery Dennison, Painesville Fasson Films

Person to Contact: Ferris Callahan

Address: 215 Chester St
Painesville, OH 44077-4117

Location of proposed air contaminant source(s) [emissions unit(s)]:
250 Chester St, Building 3
Painesville, **Ohio**

Description of proposed emissions unit(s):
Modification to PTI 02-4109 to remove annual VOC input restrictions.

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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

Pollutant	Tons Per Year
VOC	**6.72 TPY**

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

The permittee shall submit a Title V Permit application to incorporate the applicable requirements under 40 CFR Part 63, Subpart JJJJ on or before December 5, 2005.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K014 - Building #6 coating line for adhesive and hot melt products with thermal oxidizer(s); Ohio EPA emissions unit number K014 (Building #6) The requirements of this permit to install supercede the requirements of PTI 02-4109	OAC rule 3745-31-05 (A)(3) and (C)	98.5 % overall reduction of VOC by weight (100 % capture and 98.5 % destruction efficiency) for all solvent based coatings; 11.44 lbs per hour VOC as a daily average, including cleanup, and 6.72 tons of VOC per rolling 12-month period, including cleanup; The BAT determination also includes compliance with OAC rule 3745-21-09(F), 40 CFR Part 60 Subpart RR, and 40 CFR Part 63 Subpart JJJJ.
	OAC rule 3745-21-09(B) in lieu of OAC rule 3745-21-09(F)	The control efficiency limitation of 81% overall reduction of VOCs by weight (and 90% destruction) for all solvent based coatings (see A.I.2.c) specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-09(F)	The VOC content limitation for all non-solvent based coatings specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart RR (see A.I.2.d)

40 CFR Part 60 Subpart RR	The overall VOC emission reduction control efficiency emission limitation specified by this rule is less stringent than the overall VOC emission reduction control efficiency limitation established pursuant to OAC rule 3745-31-05(A)(3). The VOC content of each coating that is not vented to a thermal oxidizer (non-solvent based coatings) shall not exceed 0.20 kg /kg of coating solids applied.
40 CFR Part 63 Subpart JJJJ (Paper and Web Coating MACT)	See A.I.2.e,

2. Additional Terms and Conditions

2.a All the coaters [I-1, (36,400 acfm); I-2, (27,000 acfm); I-3, (3,600 acfm); I-5 (37,000 acfm); and the Building 6 coater (11,200 acfm and formerly the pilot coater-PTI # 02-14471)] at the Specialty Tape Division (STD) facility shall be vented to the thermal oxidizers (TOX 5-1, TOX 5-2, and TOX 5-3, or equivalent) through a manifolded system of delivery.

The normal operating scenario for this facility during the application of solvent based coatings shall include the use of thermal oxidizers with a combined capacity of 120,000 acfm or more; however, the permittee may employ solvent based coatings when one thermal oxidizer is down provided that the combined acfm for all the coaters in use does not exceed the capacity of the operating thermal oxidizer[s].

If one thermal oxidizer is not operational, the damper monitoring system (DMS) shall divert all air flow to the remaining thermal oxidizer[s]. The permittee shall operate and maintain an emergency vent alarm system which ensures that the capacity of the remaining thermal oxidizer[s] will not be exceeded.

2.b The permittee shall install and maintain a permanent total enclosure, (PTE) which complies with the requirements in 40 CFR, Part 51, Appendix M, Reference Method 204, to capture VOC emissions from this emissions unit when employing solvent based coatings.

2.c A solvent based coating is any coating that must be vented to the thermal oxidizer.

2.d A non-solvent based coating is any coating that is not vented to the thermal oxidizer.

2.e The permittee shall submit a Title V Permit application to incorporate the applicable requirements under 40 CFR Part 63, Subpart JJJJ on or before December 5, 2005.

II. Operational Restrictions

1. The average combustion temperature within each thermal oxidizer when the emissions unit is in operation and employing solvent based coatings, for any 3-hour block of time 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.

2. This coating line shall be totally enclosed such that all VOC emissions are captured, contained and, when solvent based coatings are being employed, vented to the thermal oxidizers. Compliance with the following criteria, identified by USEPA method 204, shall be met by the permittee when employing solvent based coatings:

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

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

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

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

3. This emissions unit shall be vented to the thermal oxidizers during all solvent based coating operations.

4. The permittee shall properly maintain and operate the LEL units in the plenum just prior to the bypass stack and/or any other devices or means used to ensure that emissions from solvent based coatings do not go directly to the ambient air. These records shall be made available to the Director or his representative upon request during normal business hours.

5. During the required use of the thermal oxidizers, the permittee shall ensure that any inline bypass that could divert solvent laden air from each coating applicator to the ambient air is closed.

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

6. The thermal oxidizer control systems shall be designed and operated according to good engineering practices and the manufacturer's recommendations and specifications.

7. The damper monitoring system and the emergency alarm system which diverts all air flow to the operational thermal oxidizers when the other is not functional, and alerts the permittee if the capacity of the oxidizers is exceeded, respectively, each shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

8. The permanent total enclosure shall be maintained under negative pressure, at a minimum differential pressure of 0.007 inch of water, as a three hour average at all times when the emissions unit is in operation and employing solvent based coatings.

9. The permittee shall limit coating usage so that the amount of VOC applied plus the amount of VOC from cleanup materials, is no more than 448 tons per rolling 12-month period.

10. The annual emissions of VOC from this emissions unit shall be limited to 6.72 ton per year. To accomplish this , Avery shall limit coating usage to 448 tons in a rolling 12 month period such that the amount of VOC applied before control and the total VOC emissions from uncontrolled cleanup (Section A.III.7.d.) is in compliance with this permit. In order to ensure federal enforceability during the first 12 months of operation, Avery shall provide upon request, historical records of the amount of VOC applied before control and the amount of uncontrolled cleanup.

    Thereafter, Avery shall recalculate monthly the annual VOC emissions which include content of the coatings applied and VOC from cleanup material used. Each month shall start a new 12 month period.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperatures within each thermal oxidizer when the emissions unit is in operation and employing solvent based coatings. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

    The permittee shall collect and record the following information each day:

    a. All 3-hour blocks of time during which any average combustion temperature within each thermal oxidizer, when the emissions unit was in operation and employing solvent based coatings, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit/thermal oxidizers were in compliance.

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

On and after December 5, 2005, the permittee shall comply with the applicable continuous temperature monitoring and record keeping requirments in 40 CFR Part 63, Subpart JJJJ including Section 63.3350(e)(9) in lieu of this section, if more stringent.

2. The permittee shall install, calibrate, maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the PTE to indicate that the total enclosure is operating properly. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

   On and after December 5, 2005, the permittee shall comply with the applicable continuous parametric monitoring and record keeping requirments for permanent total enclosure in 40 CFR Part 63, Subpart JJJJ including Section 63.3350(f)(9) in lieu of this section, if more stringent.

3. The permittee shall maintain records of all three-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a three hour average.

4. The permittee shall collect and record the following information daily for all coatings employed in this emissions unit that are not vented to the thermal oxidizer:

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

   b. the VOCcontent of each coating, in kg/kg of coating solids, as applied, and in lbs per gallon excluding water and exempt solvents;

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

   d. the total VOC emissions from all non-solvent based coatings employed, in pounds and tons.

5. The permittee shall collect and record the following information daily for all solvent based coatings employed in this emissions unit:

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

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

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

   d. the total uncontrolled VOC emissions from all the solvent based coatings employed, in pounds and tons; and

   e. the calculated, controlled VOC emission rate for all the solvent based coatings, in pounds (the controlled VOC emission rate for the solvent based coatings shall be calculated using the overall reduction efficiency for the control equipment as determined during the most recent compliance test that demonstrated that the emission unit was in compliance).

6. The permittee shall collect and record the following information daily for all cleanup materials:

   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 cleanup materials employed in pounds and tons;

7. The permittee shall record the following information daily:

   a. the total VOC emissions from all coatings and cleanup materials, i.e., the sum of the values from A.III.4.d, A.III.5.e, and A.III.6.d, in pounds;

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

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

8. The permittee shall record the following information monthly:

   a. the monthly summation of VOC emissions from all coatings and cleanup, in tons/month;

   b. the monthly summation of VOC usage rate (total uncontrolled VOC emissions) in this coating line, i.e., the sum of the values from A.III.4.d, A.III.5.d, and A.III.6.d, in tons/month;

   c. the rolling, 12-month summation of total VOC emissions, in tons; and

   d. the rolling, 12-month summation of total VOC usage rate (total uncontrolled VOC emissions), in tons.

9. The LEL or any other device or means which ensures that emissions from solvent based coatings do not go directly to ambient air, in the plenum just prior to the bypass stack shall be monitored daily to ensure the use of the thermal oxidizer during the use of solvent based coatings in this emissions unit.

10. The permittee shall maintain records of maintenance and operation of the LEL units or any other devices or means which ensure that emissions from solvent based coatings do not go directly to the ambient air, and these records shall be made available to the Director or his representative during normal business hours.

11. The permittee shall inspect and monitor quarterly , with a Photoionization Detector or equivalent device, all positive pressure locations between the permanent total enclosure of the coater and the thermal oxidizers for unacceptable VOC levels (greater than 100 ppm) and maintain records of the results in accordance with the permittee's 1998 preventive maintenance plan or equivalent.

12. 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.

IV. Reporting Requirements

1. The permittee shall submit quarterly summary (deviation) reports which identify :

   a. All 3-hour blocks of time during which the average combustion temperature within each thermal oxidizer did not comply with the temperature limitation specified above.

   b. All periods of downtime for the capture (collection) system, control device, and monitoring equipment, when the associated coating line was operating and employing solvent based coatings.

   c. All periods of time when the stack that bypasses the thermal oxidizers was used while employing solvent based coatings in the emissions unit.

   These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

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

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

3. Beginning with the first calendar quarter following the installation of the pressure drop monitoring equipment for the PTE, the permittee shall submit quarterly deviation (excursion) reports that identify all three-hour blocks of time, when the emissions unit was in operation and employing solvent based coatings, during which the permanent total enclosure was not maintained at the minimum pressure differential required in A.II.8.

4. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC of 6.72 tons.

6. The permittee shall submit deviation (excursion) reports that identify all exceedances of the average hourly limitation of 11.44 lbs VOC per hour for the coating line including cleanup.

7. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any quarterly record showing any unacceptable level of VOCs (greater than 100 ppm) from the positive pressure locations of the lines between the permanent total enclosure and the thermal

oxidizers. A copy of the record 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 exceedance occurred.

8. Prior to the installation of the continuous pressure drop monitoring and recording equipment , the permittee shall submit quarterly summaries of the daily inspections and weekly velocity or pressure drop measurements of the permanent total enclosure required under section A.III.3 of this permit. The summaries shall identify the days when the permanent total enclosure was not functioning properly, the cause(s) for the improper operation, and corrective actions taken. The quarterly summaries shall be submitted by January 31, April 30, and July 31, and October 31 of each year and shall cover the previous calendar quarters.

V. Testing Requirements

1. USEPA Method 24 shall be used, in accordance with OAC rule 3745-21-04(B)(5), to determine the VOC contents for all production coatings. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 cannot be used for a particular coating , the permittee shall 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.

2. Emission Limitation:

   98.5% overall VOC reduction by weight (100% capture and 98.5% destruction) for all coatings except non-solvent based coatings.

   Applicable Compliance Method:

   Performance testing was conducted on June 26, 2002 and shall be conducted again within 6 months prior to Title V permit expiration (12/04/07) ,using the following methods:

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

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

   Inital performance testing in accordance with 40 CFR Part 63, Subpart JJJJ, Section 63.3360(e) satisfies this testing obligation even if it takes place more than 6 months prior to the Title V expiration.

3. Emission Limitation

11.44 lbs per hour VOC on a daily average basis, including cleanup

Applicable Compliance Method :

Compliance shall be based on the record keeping requirements in Section A.III. 7 and 11 of these terms and conditions.

4. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be based upon the use of Method 24 , or any alter native compliance test method approved by the USEPA for determining the VOC content of each coating, and on the record keeping in Section A.III.4.

5. Emission Limitation:

6.72 tons VOC per year as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be determined by the record keeping required in Section A.III. 7. and 8.. of these terms and conditions.

Emission testing requirements

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

i. The emission testing shall be conducted within 6 months prior to Title V permit expiration (12/04/07). Inital performance testing in accordance with 40 CFR Part 63, Subpart JJJJ, Section 63.3360(e) satisfies this testing obligation even if it takes place more than 6 months prior to the Title V expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation and capture efficiency limitation for VOC of 98.5% and 100% respectively.

iii. The following test methods shall be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC:

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

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

Method 204 of 40 CFR Part 51 Appendix M.

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

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

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

The control or destruction efficiency defined as the percent reduction of mass emissions between the inlet and outlet of the control system shall be determined in accordance with the test methods and procedures specified in Ohio Administrative Code 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Northeast District Office of the Ohio EPA within 30 days following completion of the test(s). The permittee may request

additional time for the submittal of the written report, where warranted, with prior approval from the from the Northeast District Office of the Ohio EPA.

VI. Miscellaneous Requirements

This permit supercedes the previous permit to install (#02-4109) for this emissions unit issued on February 5, 1992.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K014 - Building #6 coating line for adhesive and hot melt products		

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