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Facility Name: **Coloramic Process, Inc**

Application Number: **02-2483**

Date: **October 21, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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.

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after

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commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

Facility Name: **Coloramic Process, Inc**Application Number: **02-2483**Date: **October 21, 1998**AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Coloramic Process, Inc** located in **Ashtabula** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
R001	Lacquer Coating Machine #1 for Applying Mult-Colored Lacquers to Paper and/or Cardboard Paint Chips	Uncontrolled photochemically reactive VOC emissions shall not exceed 40 lbs/day nor 8 lbs/hr. per OAC rule 3745-21- 07(G)(2).	3745-21-07 (G)(2)	VOC emissions from this emissions unit shall not exceed 40 lbs/day nor 8 lbs/hr. and 7.3 Tons per year.
R002	Lacquer Coating Machine #1 for Applying Mult-Colored Lacquers to Paper and/or Cardboard Paint Chips	Uncontrolled photochemically reactive VOC emissions shall not exceed 40 lbs/day nor 8 lbs/hr. per OAC rule 3745-21- 07(G)(2).	3745-21-07 (G)(2)	VOC emissions from this emissions unit shall not exceed 40 lbs/day nor 8 lbs/hr. and 7.3 Tons per year.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	14.6

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CONSTRUCTION STATUS

The **Ohio EPA Northeast District Office** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **Both R001 & R002 completed in 1994.**

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

INTRODUCTION:

The two emissions units covered by this permit consist of identical spray coating lines (R001 & R002) used to spray multi-colored lacquer onto the surface of small (12x18 inch) pieces of paper and/or cardboard to make "color paint chips". Each line uses a special multiple cup spray device which allows for no overspray (all lacquer directed onto paper or cardboard surfaces). Sprayed "paint chip" surfaces air dry with all VOC vapors being emitted into the room; there is no exhaust stack or vapor control system.

A. APPLICABLE EMISSIONS LIMITATIONS:

1. Volatile organic compound emissions from either of these emissions units shall not exceed 40 pounds per day nor 8 pounds per hour and 7.3 tons per year.

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B. ADDITIONAL TERMS AND CONDITIONS:

None.

C. OPERATIONAL RESTRICTIONS:

None.

D. MONITORING AND/OR RECORDKEEPING REQUIREMENTS:

1. The permittee shall collect and record the following information for each day for each the coating operation (R001 and R002):
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and,
 - f. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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2. The permittee shall collect and record the following information for the purpose of determining annual organic compound emissions:
 - a. the company identification for each nonphotochemically reactive cleanup material employed;
 - b. the number of gallons of each nonphotochemically reactive cleanup material employed;
 - c. the organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds.

E. REPORTING REQUIREMENTS:

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound emissions from each of these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

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F. TESTING REQUIREMENTS:

1. Emissions Limitation: VOC emissions from each of these emissions units shall not exceed 40 pounds per day nor 8 lbs/hr.

Applicable Compliance Method: Compliance shall be based on calculations using operations data required to be recorded for the quantity of lacquer employed in each coating line, the amount of solvent used in the formulation of the lacquer, the amount of clean-up materials employed in each coating line, and the hours of operation of each emissions unit. These calculations shall assume that all solvent constituents from the lacquer employed in each of these emissions units results in emissions to the atmosphere; emissions of clean-up materials may be reduced by the quantity of solvents recovered during this process.

G. MISCELLANEOUS REQUIREMENTS:

1. Further addition of similar emissions units at this facility shall require review of need to specifically limit emissions of hazardous air pollutants.