State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

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

09/18/07

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

08-55-14-0077
Troy Laminating and Coating, Inc.
JIM EDWARDS
421 S. UNION ST.
TROY, OH 45373-0421

Dear JIM EDWARDS:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by RAPCA within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
122 South Front Street
Columbus, Ohio 43215

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact RAPCA.

Sincerely,

Michael W. Ahern

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

cc: USEPA (electronically submitted)
File, DAPC PIER
RAPCA
Indiana

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 09/18/07	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 08-55-14-0077 to:

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

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

K002 (#9 LAMINATOR) #9 LAMINATOR	K007 (#18 COATER) #18 COATER	P013 (DRUM MIXER) COATING MIXER
K004 (#11 COATER) #11 COATER	K010 (#475 COATER) #475 COATER	P014 (COATING MIX TANK #6) ADHESIVE COATING MIXER
K005 (#16 COATER) #16 COATER	P002 (BALL MILLS) BALL MILLS	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

RAPCA
117 South Main Street
Dayton, OH 45422-1280
(937) 225-4435

Ohio Environmental Protection Agency

_____

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the

magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and

Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

   ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

   iii. a combination of i. and ii. above.

   The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
   (Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. ***State Only Enforceable Section***

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. 40 CFR Part 63, Subpart JJJJ

The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart JJJJ, in accordance with 40 CFR Part 63, Subpart JJJJ (including the Table(s) and Appendix(ices) referenced in Subpart JJJJ which are included in the text of Attachment 1 hereto, and are hereby incorporated into this permit as if fully written.

The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating:

K002, K003, K004, K005, K007 and K010.

2. 40 CFR Part 63, Subpart A

The permittee is subject to the general requirements specified in 40 CFR Part 63, Subpart A in accordance with 40 CFR Part 63, Subpart A (including the Table(s) and Appendix(ices) referenced in Subpart A) which are included in the text of Attachment 2 hereto, and are hereby incorporated into this permit as if fully written.

Ordinarily, these requirements would be incorporated into Part III of this permit; however, incorporating Subpart A into Part III of this permit was not practical due to technical incompatibilities and the limitations of the STARS program. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into STARS format.

3. 40 CFR Part 63, Subpart KK

Per 40 CFR 63.821(a)(2)(ii)(A), provided that the sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the presses using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print 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 by the press in that month, including all inboard and outboard stations, the flexographic printing stations at the facility are not an affected source subject to the emissions limitations of 40 CFR Part 63, Subpart KK. The permittee must maintain records as required in 40 CFR 63.829(f). These requirements have been incorporated into Part III of this permit.

The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart KK - National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry:

K004 and K010.

4. 40 CFR Part 63, Subpart DDDDD

The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDD.

The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Commercial and Industrial Boilers:

B007, B008, B009 and B010

All of the boilers in use at this facility are small (< 10 MMBtu) gaseous fuel-fired boilers that are affected units but do not have to meet any requirements of the rule, per 40 CFR 63.7506(c)(3). Therefore, the emissions limitations of this rule have not been incorporated into this pemit.

A. State and Federally Enforceable Section (continued)

5. Overall volatile organic compound (VOC) emissions from this facility shall not exceed 495 tons per year.

In accordance with PTI 08-01418 and 40 CFR Part 51, Appendix S, an emission offset interpretive limit of 495 tons per year of VOC was established for this facility to prevent exceedances of National Ambient Air Quality Standards (NAAQS).

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

B007 - 8.66 MMBtu natural gas-fired boiler
B008 - 8.66 MMBtu natural gas-fired boiler
B009 - 6.28 MMBtu natural gas-fired boiler
B010 - 6.28 MMBtu natural gas-fired boiler
P009 - Jaygo Dissolver, PTI 08-03249
P010 - Cowles Dissolver, PTI 08-03249
T001 - 9,000-gallon solvent storage tank
Z003 - machine parts cold cleaner
Z004 - paper breakers
Z005 - glue Mixers

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified Permit to Install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

[Authority for term OAC rule 3745-77-07(A)(13)]

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z002 - lab hoods
Z006 - lacquer storage room

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #9 LAMINATOR (K002)

Activity Description: #9 LAMINATOR

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K002 - #9 Laminator without emissions controls	OAC rule 3745-21-09(F)	The volatile organic compound (VOC) content of the coatings applied in this emissions unit shall not exceed 2.9 lbs VOC/gallon coating, excluding water and exempt solvents.
	40 CFR Part 63, Subpart JJJJ: NESHAP for Paper and Other Web Coating [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average. See A.I.2.a
	40 CFR Part 63, Subpart A: NESHAP - General Provisions	See Part II.A.2. of this permit and Table 2 to 40 CFR Part 63, Subpart JJJJ

2. Additional Terms and Conditions

2.a The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart JJJJ.

The final rules found in 40 CFR Part 63, Subpart JJJJ establish emission limitations for hazardous air pollutants (HAP), operating limits and compliance requirements for paper and other web coating operations.

The affected source is the collection of all paper and other web coating lines at the facility. The permittee became subject to the requirements and limitations of this NESHAP on December 5, 2005, at which time the initial compliance period began for the coating operations.

The permittee shall maintain this emissions unit in compliance with the applicable emission limitation in 40 CFR 63.3320 at all times. The permittee has chosen the "as applied compliant coating material" to demonstrate compliance for this emissions unit in accordance with the procedures of 40 CFR 63.3370 at all times.

[Authority for term 40 CFR 63.3320 and 40 CFR 63.3370]

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day this emissions unit is in operation:

a. The name and identification number of each coating applied.

b. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents.

c. The volume, in gallons, of each coating applied.

d. The organic HAP content, as a mass fraction, in kg of organic HAP per kilogram of coating.

[Authority for term OAC rule 3745-77-07(C)]

2. Per 40 CFR 63.3370(a)(6) affected sources (facilities) using a combination of compliant coatings and control devices to demonstrate compliance with 40 CFR 63.3320(b)(3) shall follow the procedures set out in 40 CFR 63.3370(f) according to 40 CFR 63.3370(n). The coating operations on this emissions unit are uncontrolled, therefore, the capture and control requirements of 40 CFR 63.3370(f) are not applicable.

According to 40 CFR 63.3370(n) the permittee shall collect and record the following information each month for this emissions unit:

a. The total mass of organic HAP applied calculated according to Equation 6 of 40 CFR 63.3370(d).

b. The total mass of organic HAP emitted, calculated according to 40 CFR 63.3370(n)(5)(i) (i.e., the sum of all organic HAP applied on uncontrolled coating operations calculated according to 40 CFR 63.3370(n)(4) plus the organic HAP emissions from coating operations using capture and control calculated according to 40 CFR 63.3370(n)(3)).

c. The total mass of solids applied, calculated according to 40 CFR 63.3370(n)(5)(ii), (i.e., the sum of all coating solids applied).

d. The organic HAP emission rate, in kg of organic HAP per kg of solids applied according to 40 CFR 63.3370(n)(5)(iii) and Equation 9 of 40 CFR 63.3370(h).

[Authority for term: 40 CFR 63.3370(a)(6)]

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of coatings that exceeded 2.9 lbs VOC/gallon excluding water and exempt solvents. This notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term OAC rules 3745-77-07(C) and 3745-21-09(B)]

2. The permittee shall submit annual reports that summarize the actual annual organic compound (OC) and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rule 3745-77-07(C)]

3. The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period (June 30 and December 31). The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. if there were no deviations from any emission limitations, a statement that there were no deviations from the emission limitations during the reporting period.

e. For each deviation from an emission limitation (emission limit or operating limit) where continuous emissions monitoring systems (CEMS) are not used to comply with the emission limitations of 40 CFR 63 Subpart JJJJ, the compliance report must contain the following information:

(i) The total operating time of each affected source during the reporting period.

(ii) The number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(iii) The number, duration, and cause for continuous paramater monitoring system (CPMS) downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

[Authority for term 40 CFR 63.3400(c)]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:
The VOC content of the coating applied in this emissions unit shall not exceed 2.9 lbs VOC/gallon excluding water and exempt solvents.

Applicable Compliance Method:
The permittee shall demonstrate compliance based on the record keeping requirements A.III.1 of this permit.

For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

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

[Authority for term OAC rules 3745-77-07(C) and 3745-21-04(B)(5)]

1.b Emission Limitation:
The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.1. The organic HAP content, of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(c). The VOC content and coating solids content of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(d).

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 63.3360]

VI. Miscellaneous Requirements

1. The thermal incinerator and carbon adsorption emission controls have been removed from this emissions unit. Therefore, the emissions of all VOCs and organic HAP from this emissions shall equal the mass of all VOCs and organic HAPs applied in this emissions unit.

[Authority for term OAC rule 3745-77-07(C)]

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #11 COATER (K004)

Activity Description: #11 COATER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K004 - #11 Coater with flexopraphic printing station - uncontrolled	OAC rule 3745-21-09(F)	The volatile organic compund (VOC) content of the coatings applied in this emissions unit shall not exceed 2.9 lbs VOC/gallon excluding water and exempt solvents.
	OAC rule 3745-21-09(Y)	See A.I.2.a
	40 CFR Part 63 Subpart KK: NESHAP for Printing and Publishing Industry [40 CFR 63.821(a)(2)(ii)(A)]	See A.I.2.b
	40 CFR Part 63 Subpart JJJJ: NESHAP for Paper and Other Web Coating [40CFR 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average. See A.I.2.c.
	40 CFR Part 63, Subpart A: NESHAP - General Provisions	See Part II.A.2. of this permit and Table 2 to 40 CFR Part 63, Subpart JJJJ.

2. Additional Terms and Conditions

2.a The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year, and therefore, are exempt from the requirements of OAC rule 3745-21-09(Y)(1), per OAC rule 3745-21-09(Y)(2)(b).

2. Additional Terms and Conditions (continued)

2.b The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print 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 by the press in that month, including all inboard and outboard stations. Provided that the permittee maintains records as required in 40 CFR 63.829(f), the flexographic printing station on this emissions unit is not an affected source subject to the emissions limitations of 40 CFR Part 63, Subpart KK, per 40 CFR 63.821(a)(2)(ii)(A).

2.c The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart JJJJ.

The final rules found in 40 CFR Part 63, Subpart JJJJ establish emission limitations for hazardous air pollutants (HAP), operating limits and compliance requirements for paper and other web coating operations.

The affected source is the collection of all paper and other web coating lines at the facility. The permittee became subject to the requirements and limitations of this NESHAP on December 5, 2005, at which time the initial compliance period began for the coating operations.

The permittee shall maintain this emissions unit in compliance with the applicable emission limitation in 40 CFR 63.3320 at all times. The permittee has chosen the "as applied compliant coating material" to demonstrate compliance for this emissions unit in accordance with the procedures of 40 CFR 63.3370 at all times.

[Authority for term 40 CFR 63.3320 and 40 CFR 63.3370]

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day this emissions unit is in operation:

a. The name and identification number of each coating applied.

b. The VOC content of each coating, in pounds/gallon, excluding water and exempt solvents.

c. The volume, in gallons, of each coating applied.

[Authority for term OAC rule 3745-77-07(C)]

2. The permittee shall collect and record the following information each month for this emissions unit.

a. The company identification for each coating, flexographic ink, thinner and cleanup material employed.

b. The number of gallons of each coating, flexographic ink, thinner and cleanup material employed.

c. The VOC content of each coating, flexographic printing ink, thinner and cleanup material, in pounds per gallon.

d. The VOC emission rate for all coatings, flexographic inks, thinners and cleanup materials, in pounds or tons per month (b x c).

[Authority for term OAC rule 3745-77-07(C)]

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

3. Per 40 CFR 63.3370(a)(6) affected sources (facilities) using a combination of compliant coatings and control devices to demonstrate compliance with 40 CFR 63.3320(b)(3) shall follow the procedures set out in 40 CFR 63.3370(f) according to 40 CFR 63.3370(n). The coating operations on this emissions unit are uncontrolled, therefore, the capture and control requirements of 40 CFR 63.3370(f) are not applicable. According to 40 CFR 63.3370(n) the permittee shall collect and record the following information each month for this emissions unit.

a. Per 40 CFR 63.3370(n)(4), the total mass of organic HAP applied calculated according to Equation 6 of 40 CFR 63.3370(d).

b. The total mass of organic HAP emitted, calculated according to 40 CFR 63.3370(n)(5)(i), (i.e., the sum of all organic HAP applied on uncontrolled coating operations calculated according to 40 CFR 63.3370(n)(4) plus the organic HAP emissions from coating operations using capture and control calculated according to 40 CFR 63.3370(n)(3)).

c. The total mass of solids applied, calculated according to 40 CFR 63.3370(n)(5)(ii) and 63.3360(d). (i.e., the sum of all coating solids applied).

d. The organic HAP emission rate, in kg of organic HAP per kg of solids applied according to 40 CFR 63.3370(n)(5)(iii) and Equation 9 of 40 CFR 63.3370(h).

[Authority for term 40 CFR 63.3370(n)(4)]

4. According 40 CFR 63.829(f), the owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of section 63.821(a)(2)(ii)(A) shall maintain the records specified in paragraphs (f)(1) and (f)(2) of this section for five years and submit them to the Administrator and the appropriate Ohio EPA district office or local air agency upon request:

a. The total mass of each material applied each month on the press, including all inboard and outboard stations, and

b. The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.

[Authority for Term 40 CFR 63.829(f)]

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded 2.9 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term OAC rules 3745-77-07(C) and 3745-21-09(B)]

2. The permittee shall submit annual reports that summarize the actual annual organic compound (OC) and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rule 3745-77-07(C)]

IV. Reporting Requirements (continued)

3. The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period (June 30 and December 31). The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. if there were no deviations from any emission limitations, a statement that there were no deviations from the emission limitations during the reporting period.

e. For each deviation from an emission limitation (emission limit or operating limit) where continuous emissions monitoring systems (CEMS) are not used to comply with the emission limitations of 40 CFR 63 Subpart JJJJ, the compliance report must contain the following information:

(i) The total operating time of each affected source during the reporting period.

(ii) The number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(iii) The number, duration, and cause for continuous paramater monitoring system (CPMS) downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

[Authority for term 40 CFR 63.3400(c)]

V. Testing Requirements

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

1.a Emission Limitation:
The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

Applicable Compliance Method:
For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

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

[Authority for term OAC rules 3745-77-07(C) and 3745-21-04(B)(5)]

1.b Emission Limitation:
The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.2 of this permit and shall be the sum of all flexographic printing ink used at the facility for the calendar year.

[Authority for term OAC rule 3745-77-07(C)]

V. Testing Requirements (continued)

2. Emission Limitation:
The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print 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 by the press in that month, including all inboard and outboard stations.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.4 according to the requirements of 40 CFR 63.829(f).

[Authority for term 40 CFR 63.829(f)]

3. Emission Limitation:
The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.3. The organic HAP content, of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(c). The VOC content and coating solids content of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(d).

[Authority for term 40 CFR 63.3360(c)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #16 COATER (K005)

Activity Description: #16 COATER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
#16 COATER aqueous or solvent based coating line with permanent total enclosure and thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 08-210)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2,750 pounds per day and 97.0 tons per year. Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-09(F) or 3745-21-09(B)(6).
	OAC rule 3745-21-09(F)	The volatile organic compound (VOC) content of the coatings applied in this emissions unit shall not exceed 2.9 lbs VOC/gallon excluding water and exempt solvents when the thermal incinerator is not employed.
	OAC rule 3745-21-09(B)(6)	As an alternative to compliance with the requirements of OAC rule 3745-21-09(F); the overall VOC emissions from this emissions unit shall be reduced by 81% by weight and the minimum destruction efficiency of the thermal incinerator shall be at least 90%.
	40 CFR Part 63, Subpart JJJJ: NESHAP for Paper and Other Web Coating [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average. See A.I.2.a, A.I.2.b, A.I.2.c, and A.I.2.d.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart A: NESHAP - General Provisions	See Part II.A.2. of this permit and Table 2 to 40 CFR Part 63, Subpart JJJJ.
	40 CFR Part 64 (Compliance Assurance Monitoring)	See sections A.II.1, A.II.2, A.III.2, A.III.3, A.III.9, A.III.10through A.III.11 and A.IV.8 through A.IV.11.

2. Additional Terms and Conditions

2.a The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart JJJJ.

The final rules found in 40 CFR Part 63, Subpart JJJJ establish emission limitations for hazardous air pollutants (HAP), operating limits and compliance requirements for paper and other web coating operations.

The affected source is the collection of all paper and other web coating lines at the facility. The permittee became subject to the requirements and limitations of this NESHAP on December 5, 2005, at which time the initial compliance period began for the coating operations.

The permittee shall maintain this emissions unit in compliance with the applicable emissions limitation in 40 CFR 63.3320 at all times. The permittee has chosen a combination of "as applied compliant coating materials" and the use of "add on control devices". Compliance shall be determined according to the coatings analysis requirements and operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3370 at all times except during periods of startup, shutdown, and malfunction.

[Authority for term 40 CFR 63.3320, 40 CFR 63.3321, 40 CFR 63.3330, and 40 CFR 63.3370]

2.b The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device. If it can be demonstrated that there is no leakage between the coating application, the oven, and the control device and that the oven and control device are operated under negative pressure, they do not need to be enclosed. The permittee shall install, operate, and maintain monitoring devices in accordance with a site specific monitoring plan when the emissions unit is in operation. The minimum contents of the site-specific monitoring plan are defined in A.III.4. of this permit.

The permanent total enclosure serving this emissions unit shall be maintained under negative pressure as required in this permit whenever the emissions unit is in operation and shall capture all of the VOC emissions from this emissions unit. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for Term 40 CFR 63.3350(f) and 40 CFR 63.3360(k)]

II. Operational Restrictions

1. The average temperature in the combustion chamber of the thermal incinerator in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance. [The emissions test program that demonstrated compliance was conducted on May 11, 2006, with an average combustion chamber temperature of 1,460 degrees Fahrenheit.] This minimum combustion chamber temperature is subject to revision, if emissions testing during the term of this permit demonstrates that the emissions unit is in compliance at a different combustion chamber temperature.

[Authority for term OAC rule 3745-77-07(C), 40 CFR 63.3350(e), 40 CFR 63.3360(e)(3)(B), 40 CFR 63.3370(k) and 40 CFR 63.3370(n)]

2. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for term 40 CFR 63.3350(f), 40 CFR 63.3360(f), 40 CFR 63.3370(k) 40 CFR 63.3370(n), and 40 CFR 51, Appendix M, Method 204]

III. Monitoring and/or Record Keeping Requirements

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

a. The company identification of each surface coating employed.

b. The number of gallons of each surface coating employed.

c. The VOC content for each surface coating employed, in pounds per gallon.

d. The uncontrolled VOC emission rate from each surface coating employed, in pounds (bxc).

e. The total controlled VOC emission rate from all the surface coatings vented to the thermal incinerator, in pounds, i.e., the value from (d) multiplied by the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance. (Until additional emission tests are conducted, an average overall control efficiency of 95.9% (1-0.959) shall be used in this calculation).

f. The VOC content of each surface coating employed, in pounds per gallon, excluding water and exempt solvents.

[Authority for term OAC rule 3745-77-07(C)]

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

2. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the combustion chamber of the thermal incinerator (or immediately downstream of the combustion chamber before any substantial heat exchange) when the emissions unit is in operation. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained during the performance test that demonstrated compliance; and

b. a log of the downtime for the capture (collection) system, thermal incinerator, and/or monitoring equipment when the associated emissions unit was in operation.

If there is any excursion of the average thermal incinerator combustion temperature during the quarter, the permittee shall submit a QIP as required in A.III.10. of this permit.

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 64.3(a) and (c)]

3. The permittee shall perform daily inspections of the permanent total enclosure to ensure that the following conditions are being maintained when the emissions unit is in operation:

a. all access doors and windows that are not natural draft openings are closed; and

b. the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

c. Record the pressure differnential across the enclosure.

Records shall be maintained of the results of each daily inspection and shall include any corrective actions taken by the permittee. If negative pressure is not maintained across the enclosure, the permittee shall develop a QIP as required in section A.III.10. of this permit.

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 64.3(a) and (c)]

4. The permittee shall operate and maintian a continuous parameter monitoring system (CPMS) for the thermal incinerator used to comply with the emissions standards of 40 CFR 63.3320 in accordance with the following requirements:

a. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. A minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.

b. Valid data must be collected from at least 90 percent of the hours during which the process operated.

c. Determine the hourly average of all recorded readings, consisting of at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control. Provided all of the readings recorded clearly demonstrate continuous compliance with the applicable standard of 40 CFR 63.3320 the hourly average of all recorded readings is not required.

d. Determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, at least two of three of the hourly averages for that period using only average values that are based on valid data are required (i.e., not from out-of-control periods).

e. Record the results of each inspection, calibration, and validation check of the CPMS.

f. At all times, maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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

g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), monitoring must be conducted at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in 40 CFR 63.3370. All the valid data collected must be used during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

h. Any averaging period for which valid monitoring data is not collected and such data are required constitutes a deviation, the permittee shall notify the Administrator, the appropriate Ohio EPA District Office or Local Air Agency in accordance with 40 CFR 63.3400(c).

i. Calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. The equipment must be replaced whether you choose not to perform the calibration or the equipment cannot be calibrated properly.

j. Calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1 Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

[Authority for term 40 CFR 63.3350(e)]

5. The permittee must develop a site-specific monitoring plan for each capture system and control device. The plan must:

a. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained.

b. Explain why the operating parameter identified is appropriate for demonstrating ongoing compliance.

c. Identify the specific monitoring procedures.

d. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in 40 CFR 63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

e. The plan must be reviewed and updated at least annually.

All capture system monitoring in accordance with the plan and any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.

[Authority for term 40 CFR 63.3350(f) and 40 CFR 63.3370(n)]

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

6. The permittee shall collect and record the following information each month for this emissions unit:

a. The mass, in kilograms, of each coating material applied.

b. The HAP content of each coating material, as applied, according to the procedures of 40 CFR 63.3360(c).

c. The coating solids content of each coating applied, according to the procedures of 40 CFR 63.3360(d).

d. Uncontrolled HAP emissions, in kilograms, according to the procedures of 40 CFR 63.3370(d), Equation 6.

e. The control efficiency of the thermal incinerator calculated according to the procedures of 40 CFR 63.3370(i), Equation 11.

f. Total organic HAP emissions, in kilograms, according to the procedures of 40 CFR 63.3370(o), Equation 15.

g. The controlled organic HAP emission rate, in kilogram organic HAP/kilogram coating solids applied according to the procedures of 40 CFR 63.3370(h), Equation 9.

[Authority for term 40 CFR 63.3370(k) and 40 CFR 63.3370(n)]

7. The permittee shall maintain records of the following information for a period of 5 years following the date of each occurrence, measurement, maintenance activity, corrective action, report, and/or record:

a. the occurrence and duration of each startup or shutdown when the startup or shutdown causes the emissions unit to exceed any applicable emission limitation in the NESHAP;

b. the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or the required air pollution control and monitoring equipment;

c. all required maintenance performed on the air pollution control and monitoring equipment, i.e., date, equipment, maintenance activity performed;

d. actions taken during periods of startup and shutdown, when the emissions unit exceeds any applicable emission limitation in the NESHAP, and when these actions are different from the procedures specified in the emissions unit's startup, shutdown, and malfunction plan (SSMP);

e. actions taken during periods of malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment) that are different from the procedures specified in the emissions unit's SSMP;

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

f. actions taken to demonstrate compliance with the SSMP during periods of startup and/or shutdown, where an applicable NESHAP emission limitation was exceeded; and actions taken during any malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment), where the actions are consistent with the procedures specified in the SSMP*;

g. each period of operation (date and number of hours) during which a/the continuous monitoring system (CMS) is inoperative or is not functioning properly;

h. all required measurements needed to demonstrate compliance with the limitations contained in this permit, including, but not limited to: the 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and any supporting data needed to demonstrate compliance with the limitations and reporting requirements of the NESHAP;

i. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;

j. all measurements needed to determine the conditions of performance tests and performance evaluations, including the analysis of samples, determination of emissions, and raw data;

k. all CMS calibration checks;

l. all adjustments and maintenance performed on CMS; and

m. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9, and as required in this permit.

* The information needed to demonstrate compliance with the SSMP plan may be recorded using a "checklist" or some other effective form of record keeping, in order to minimize the recording burden for conforming procedures.

[Authority for Term 40 CFR 63.10(b)]

8. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) for this emissions unit by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3).

[Authority for term 40 CFR 63.6(e)(3) and 40 CFR 63.3340]

9. Operation of approved monitoring.

a. Commencement of operation. The owner or operator shall conduct the monitoring required under 40 CFR Part 64 upon issuance of a Part 70 or 71 permit that includes such monitoring.

b. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

d. Response to excursions or exceedances.

i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

e. Documentation of need for improved monitoring. After approval of monitoring under 40 CFR Part 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: 40 CFR 64.7]

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

10. Quality improvement plan (QIP) requirements.

a. Based on the results of a determination made under section A.III.9.d.ii of this permit, the Administrator or the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) may require the owner or operator to develop and implement a QIP. Consistent with section 64.6(c)(3) of 40 CFR Part 64, the Part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

b. Elements of a QIP:

i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(a) Improved preventive maintenance practices.

(b) Process operation changes.

(c) Appropriate improvements to control methods.

(d) Other steps appropriate to correct control performance.

(e) More frequent or improved monitoring (only in conjunction with one or more steps under sections A.III.10.b.ii.(a) through (d) above.

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to section A.III.9.d.ii of this permit the Administrator or the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

i. Failed to address the cause of the control device performance problems; or

ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[Authority for term: 40 CFR 64.8]

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

11. General record keeping requirements.

a. The owner or operator shall comply with the record keeping requirements specified in section 70.6(a)(3)(ii) of 40 CFR Part 70. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to section A.III.12 of this permit and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

[Authority for term: 40 CFR 64.9(b)]

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded 2.9 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term OAC rule 3745-77-07(C)]

2. The permittee shall submit quarterly deviation reports that identify any days when the VOC emissions from this emissions unit exceeded 2,750 pounds per day.

[Authority for term OAC rule 3745-77-07(C)]

3. The permittee shall submit annual reports that summarize the actual annual OC and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rules 3745-77-07(C) and 3745-78]

IV. Reporting Requirements (continued)

4. The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period (June 30 and December 31). The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. if there were no deviations from any emission limitations, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

e. For each deviation from an emission limitation (emission limit or operating limit) where CEMS are not used to comply with the emission limitations of 40 CFR 63 Subpart JJJJ, the compliance report must contain the following information:

(i) The total operating time of each affected source during the reporting period.

(ii) The number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(iii) The number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

f. All 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance.

[Authority for term 40 CFR 63.3400(c)]

5. The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

(i) the name, title, and signature of the responsible official who is certifying the accuracy of the report,

(ii) an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and

(iii) if any excess emissions and/or parameter monitoring exceedances have occurred.

[Authority for term 40 CFR 63.6(e)(3) and 40 CFR 63.3400(g)]

IV. Reporting Requirements (continued)

6. The permittee shall immediately report a startup, shutdown, and/or malfunction event to the regulating agency when either of the following scenarios occur:

a. actions taken by the permittee/operator during a startup or shutdown cause the emissions unit(s) to exceed an emission limitation from the NESHAP and procedures specified in the SSMP are not followed; and/or

b. actions taken during a malfunction are not consistent with the procedures specified in the SSMP.

The immediate report shall consist of a telephone call (or facsimile (FAX) transmission) to the director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event. The written report shall contain:
(i) the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy;
(ii) the explanation of the circumstances of the event;
(iii) the reasons for not following the SSMP;
(iv) description of all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions); and
(v) actions taken to minimize emissions in conformance with 40 CFR 63.6(e)(1)(i) and as required in this permit.

[Authority for term 40 CFR 63.10(d)(5)]

7. Performance test results for the emission capture system(s) and add-on control device(s) shall be submitted no later than 30 days after completion of the performance test(s). Results of each performance test shall include the analysis of samples, determination of emissions, and the supporting raw data. Performance testing results shall be retained for a minimum of 5 years from the test date and shall be made available to the director, or representative of the director, upon request.

[Authority for term 40 CFR 63.7(g), 40 CFR 63.3400(f) and OAC rule 3745-15-04(A)]

8. General reporting requirements.

a. On and after the date specified in section A.III.9.a of this permit by which the owner or operator must use monitoring that meets the requirements of 40 CFR Part 64, the owner or operator shall submit monitoring reports to the permitting authority in accordance with section 70.6(a)(3)(iii) of 40 CFR Part 70.

b. A report for monitoring under 40 CFR Part 64 shall include, at a minimum, the information required under section 70.6(a)(3)(iii) of 40 CFR Part 70 and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

iii. A description of the actions taken to implement a QIP during the reporting period as specified in section A.III.10 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[Authority for term: 40 CFR 64.9(a)]

IV. Reporting Requirements (continued)

9. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1,460 degrees Fahrenheit or below the average temperature recorded during the most recent performance test. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: 40 CFR 64.9(a)]

10. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow, air flow in a direction leaving the enclosure, or the pressure differential was less than or equal to 0.007 inch of water column. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: 40 CFR Part 64.9(a)]

11. The permittee shall notify the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) upon any establishment or reestablishment of the thermal incinerator's average combustion temperature. The notification shall include the determination of the thermal incinerator's average combustion temperature value. The notification shall be submitted within 30 days following completion of the performance test(s). This notification may be included in the report require by section A.V.2 of this permit.

[Authority for term: 40 CFR 64.6(c)(2)]

V. Testing Requirements

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

1.a Emission Limitation:
The VOC emissions from this emissions unit shall not exceed 2,750 pounds per day.

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

[Authority for term OAC rule 3745-77-07(C)]

1.b Emission Limitation:
The VOC emissions from this emissions unit shall not exceed 97.0 tons per year.

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

[Authority for term OAC rule 3745-77-07(C)]

V. Testing Requirements (continued)

1.c Emissions Limitation:
The VOC content of the coating applied in this emissions unit shall not exceed 2.9 lbs VOC/gallon, excluding water and exempt solvents.

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

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

[Authority for term OAC rules 3745-77-07(C), 3745-21-09(F), and 3745-21-04(B)(5)]

1.d Emission Limitation:
The overal VOC emissions from this emissions unit shall be reduced by a minimum of 81% and a minimum 90% destruction efficiency when VOC emissions are vented to the thermal incinerator.

Applicable Compliance Method:
Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in section A.V.2 and monitoring as outlined in Section A.III.2 of this permit.

[Authority for term OAC rule 3745-77-07(C)]

1.e Emission Limitation:
The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:
Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in section A.V.2 and monitoring as outlined in A.III.4 of this permit.

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 63.3370]

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within two years of permit expiration.

b. The emission testing shall be conducted in order to determine:

(i) the capture efficiency of the emission capture system, and the destruction efficiency of the thermal incinerator, both in percent.

(ii) the minimum operating limits for the thermal incinerator by recording and calculating the average combustion temperature during emissions testing.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;

Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of each add-on control device simultaneously, using:

Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm

Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Emissions units K005 and K007 are both vented to the thermal incinerator, therefore, separate compliance determinations will be required:

i. while both emissions units are operating to determine compliance at maximum operating conditions and;

ii. while one emissions unit is operating to establish minimum operating temperature limits.

e. Gaseous non-methane organic compound mass flow rates shall be determined simultaneously for the inlet and the outlet of the thermal incinerator for each of 3 test runs.

f. The gaseous non-methane organic compound mass flow rate, in kg/hr or pounds/hour, shall be calculated according to the procedures of 40 CFR 63.3360(e), (Equation 1).

g. For each test run the add-on control device organic emissions destruction or removal efficiency shall be calculated according to the procedures of 40 CFR 63.3360(e), (Equation 2).

V. Testing Requirements (continued)

h. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

[Authority for term OAC rule 3745-77-07(C), 40 CFR 63.3360(e) and 40 CFR 63.7(b)(1)]

VI. Miscellaneous Requirements

1. The carbon adsorption emission controls listed in PTI 08-218 have been removed from this emissions unit.

[Authority for term OAC rule 3745-77-07(C)]

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #18 COATER (K007)

Activity Description: #18 COATER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
#18 coater - aqueous or solvent based coating line with permanent total enclosure and thermal incinerator	OAC rule 3745-31-05(A)(3) (PTI 08-01416)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 72.2 pounds per hour and 77.9 tons per year. The VOC content of the coatings applied in this emissions unit with out employing the thermal incinerator shall not exceed 1.0 pound VOC per gallon excluding water and exempt solvents. The VOC content of the coatings applied in this emissions unit while venting to the thermal incinerator shall not exceed 1.0 pound VOC per gallon after application of emissions control efficiency. See A.I.2.a and A.I.2.b
	OAC rule 3745-21-09(F)	The emissions limitation specified in the rule is less stringent than the emissions limitation established according to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(B)(6)	The emissions limitation specified in the rule is less stringent than the emissions limitation established according to OAC rule 3745-31-05(A)(3).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart JJJJ: NESHAP for Paper and Other Web Coating [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average. See A.I.2.c, and A.I.2.d.
	40 CFR Part 63, Subpart A: NESHAP - General Provisions	See Part II.A.2. of this permit and Table 2 to 40 CFR Part 63, Subpart JJJJ.
	40 CFR Part 64 (Compliance Assurance Monitoring)	A.II.1, A.II.2, A.III.3, A.III.4, A.III.10 through A.III.12 and A.IV.8 through A.IV.11

2. Additional Terms and Conditions

2.a The VOC emissions from this emissions unit shall be reduced by a minimum of 86% by weight when operating and venting to the thermal incinerator.

[Authority for term PTI 08-01416]

2.b The maximum unconrolled VOC emissions rate from this emissions unit shall not exceed 81,146 pounds per month from the use of compliant coatings when not venting to the thermal incinerator.

[Authority for term PTI 08-01416]

2.c The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart JJJJ.

The final rules found in 40 CFR Part 63, Subpart JJJJ establish emission limitations for hazardous air pollutants (HAP), operating limits and compliance requirements for paper and other web coating operations.

The affected source is the collection of all paper and other web coating lines at the facility. The permittee became subject to the requirements and limitations of this NESHAP on December 5, 2005, at which time the initial compliance period began for the coating operations.

The permittee shall maintain this emissions unit in compliance with the applicable emissions limitation in 40 CFR 63.3320 at all times. The permittee has chosen a combination of "as applied compliant coating materials" and the use of "add on control devices". Compliance shall be determined according to the coatings analysis requirements and operating limits for emission capture systems and add-on control devices required by 40 CFR 63.3370 at all times except during periods of startup, shutdown, and malfunction.

[Authority for term 40 CFR 63.3320 and 40 CFR 63.3370]

2. Additional Terms and Conditions (continued)

2.d The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device. If it can be demonstrated that there is no leakage between the coating application, the oven, and the control device and that the oven and control device are operated under negative pressure, they do not need to be enclosed. The permittee shall install, operate, and maintain monitoring devices in accordance with a site-specific monitoring plan when the emissions unit is in operation. The minimum contents of thesite-specific monitoring plan are defined in Section III.3. of this permit.

The permanent total enclosure serving this emissions unit shall be maintained under negative pressure as required in this permit whenever the emissions unit is in operation and shall capture all of the VOC emissions from this emissions unit. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for Term 40 CFR 63.3350(f) and 40 CFR 63.3360(k)]

II. Operational Restrictions

1. The average temperature in the combustion chamber of the thermal incinerator in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance. [The most recent emissions test program that demonstrated compliance was conducted on May 11, 2006, with an average combustion chamber temperature of 1,460 degrees Fahrenheit.] This minimum combustion chamber temperature is subject to revision, if emissions testing during the term of this permit demonstrates that the emissions unit is in compliance at a different combustion chamber temperature.

[Authority for term OAC rule 3745-77-07(C), 40 CFR 63.3350(e), 40 CFR 63.3360(e)(3)(B), 40 CFR 63.3370(k) and 40 CFR 63.3370(n)]

2. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation. Negative pressure shall be visually monitored using streamers, plastic flow indicating strips, string, or other visually noticeable flow indicating device that shows the direction of air flow through each natural draft opening to be into the enclosure.

[Authority for term 40 CFR 63.3350(f), 40 CFR 63.3360(f), 40 CFR 63.3370(k) 40 CFR 63.3370(n), and 40 CFR 51, Appendix M, Method 204]

III. Monitoring and/or Record Keeping Requirements

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

a. The company identification of each surface coating employed.

b. The number of gallons of each surface coating employed.

c. The VOC content for each surface coating employed, in pounds per gallon.

d. The VOC content, in pounds per gallon excluding water and exempt solvents, of each surface coating employed.

e. The uncontrolled VOC emsision rate from all the surface coatings vented to the thermal incinerator, in pounds (b x c when the emissions unit is venting to the thermal incinerator).

f. The uncontrolled VOC emission rate from all the surface coatings vented directly to the atmosphere, in pounds (b x c when the thermal incinerator is not operating).

g. The total uncontrolled VOC emissions (prior to capture and control), in pounds, from all the surface coatings employed (e + f).

h. The total controlled VOC emission rate from all the surface coatings vented to the thermal incinerator, in pounds, (e x 1-CE) where CE is the overall control efficiency measured during the most recent performance evaluation that showed the emissions unit was in compliance. Until additional emission tests are conducted, an overall control efficiency of 95.9% shall be used in this calcualtion.

i. The VOC content after control, in pounds per gallon excluding water and exempt solvents, of the coatings that were vented to the thermal oxidizer (d x 1-CE).

j. The total actual VOC emission rate from all the surface coatings employed, in pounds (f+h).

k. The number of hours the emissions unit was in operation.

l. The average hourly VOC emissions, i.e., (j)/(k), in pounds/hour (average).

[Authority for term OAC rule 3745-77-07(C)]

2. The permittee shall maintain monthly records of the total uncontrolled VOC emissions (prior to capture and control), in pounds, from all the surface coatings employed [the total uncontrolled VOC emissions shall be the sum of the daily VOC emission rates (from A.III.1.g) for the calendar month].

[Authority for term OAC rule 3745-77-07(C)]

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

3. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the combustion chamber of the thermal incinerator (or immediately downstream of the combustion chamber before any substantial heat exchange) when the emissions unit is in operation. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained during the performance test that demonstrated compliance; and

b. a log of the downtime for the capture (collection) system, thermal incinerator, and/or monitoring equipment when the associated emissions unit was in operation.

If there is any excursion of the average thermal incinerator combustion temperature during the quarter, the permittee shall submit a QIP as required in A.III.10. of this permit.

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 64.3(a) and (c)]

4. The permittee shall perform daily inspections of the permanent total enclosure to ensure that the following conditions are being maintained when the emissions unit is in operation:

a. all access doors and windows that are not natural draft openings are closed; and

b. the direction of air at each natural draft opening is inward, as shown by streamers, smoke tubes, tracer gases, and/or other air flow monitoring devices.

c. Record the pressure differnential across the enclosure.

Records shall be maintained of the results of each daily inspection and shall include any corrective actions taken by the permittee. If negative pressure is not maintained across the enclosure, the permittee shall develop a QIP as required in section A.III.10. of this permit.

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 64.3(a) and (c)]

5. The permittee shall operate and maintian a continuous parameter monitoring system (CPMS) for the thermal incinerator used to comply with the emissions standards of 40 CFR 63.3320 in accordance with the following requirements:

a. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. A minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.

b. Valid data must be collected from at least 90 percent of the hours during which the process operated.

c. Determine the hourly average of all recorded readings, consisting of at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control. Provided all of the readings recorded clearly demonstrate continuous compliance with the applicable standard of 40 CFR 63.3320 the hourly average of all recorded readings is not required.

d. Determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, at least two of three of the hourly averages for that period using only average values that are based on valid data are required (i.e., not from out-of-control periods).

e. Record the results of each inspection, calibration, and validation check of the CPMS.

f. At all times, maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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

g. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), monitoring must be conducted at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in 40 CFR 63.3370. All the valid data collected must be used during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

h. Any averaging period for which valid monitoring data is not collected and such data are required constitutes a deviation, the permittee shall notify the Administrator, the appropriate Ohio EPA District Office or Local Air Agency in accordance with 40 CFR 63.3400(c).

i. Calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. The equipment must be replaced whether you choose not to perform the calibration or the equipment cannot be calibrated properly.

j. Calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1 Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

[Authority for term 40 CFR 63.3350(e)]

6. The permittee must develop a site-specific monitoring plan for each capture system and control device. The plan must:

a. Identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained.

b. Explain why the operating parameter identified is appropriate for demonstrating ongoing compliance.

c. Identify the specific monitoring procedures.

d. The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in 40 CFR 63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

e. The plan must be reviewed and updated at least annually.

All capture system monitoring in accordance with the plan and any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.

[Authority for term 40 CFR 63.3350(f) and 40 CFR 63.3370(n)]

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

7. The permittee shall collect and record the following information each month for this emissions unit:

a. The mass, in kilograms, of each coating material applied.

b. The HAP content of each coating material, as applied, according to the procedures of 40 CFR 63.3360(c).

c. The coating solids content of each coating applied, according to the procedures of 40 CFR 63.3360(d).

d. Uncontrolled HAP emissions, in kilograms, according to the procedures of 40 CFR 63.3370(d), Equation 6.

e. The control efficiency of the thermal incinerator calculated according to the procedures of 40 CFR 63.3370(i), Equation 11.

f. Total organic HAP emissions, in kilograms, according to the procedures of 40 CFR 63.3370(o), Equation 15.

g. The controlled organic HAP emission rate, in kilogram organic HAP/kilogram coating solids applied according to the procedures of 40 CFR 63.3370(h), Equation 9.

[Authority for term 40 CFR 63.3370(k) and 40 CFR 63.3370(n)]

8. The permittee shall maintain records of the following information for a period of 5 years following the date of each occurrence, measurement, maintenance activity, corrective action, report, and/or record:

a. the occurrence and duration of each startup or shutdown when the startup or shutdown causes the emissions unit to exceed any applicable emission limitation in the NESHAP;

b. the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or the required air pollution control and monitoring equipment;

c. all required maintenance performed on the air pollution control and monitoring equipment, i.e., date, equipment, maintenance activity performed;

d. actions taken during periods of startup and shutdown, when the emissions unit exceeds any applicable emission limitation in the NESHAP, and when these actions are different from the procedures specified in the emissions unit's startup, shutdown, and malfunction plan (SSMP);

e. actions taken during periods of malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment) that are different from the procedures specified in the emissions unit's SSMP;

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

f. actions taken to demonstrate compliance with the SSMP during periods of startup and/or shutdown, where an applicable NESHAP emission limitation was exceeded; and actions taken during any malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment), where the actions are consistent with the procedures specified in the SSMP*;

g. each period of operation (date and number of hours) during which a/the continuous monitoring system (CMS) is inoperative or is not functioning properly;

h. all required measurements needed to demonstrate compliance with the limitations contained in this permit, including, but not limited to: the 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and any supporting data needed to demonstrate compliance with the limitations and reporting requirements of the NESHAP;

i. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;

j. all measurements needed to determine the conditions of performance tests and performance evaluations, including the analysis of samples, determination of emissions, and raw data;

k. all CMS calibration checks;

l. all adjustments and maintenance performed on CMS; and

m. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9, and as required in this permit.

* The information needed to demonstrate compliance with the SSMP plan may be recorded using a "checklist" or some other effective form of record keeping, in order to minimize the recording burden for conforming procedures.

[Authority for Term 40 CFR 63.10(b)]

9. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) for this emissions unit by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3).

[Authority for term 40 CFR 63.6(e)(3) and 40 CFR 63.3340]

10. Operation of approved monitoring.

a. Commencement of operation. The owner or operator shall conduct the monitoring required under 40 CFR Part 64 upon issuance of a Part 70 or 71 permit that includes such monitoring.

b. Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c. Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

d. Response to excursions or exceedances.

i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

e. Documentation of need for improved monitoring. After approval of monitoring under 40 CFR Part 64, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[Authority for term: 40 CFR 64.7]

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

11. Quality improvement plan (QIP) requirements.

a. Based on the results of a determination made under section A.III.10.d.ii of this permit, the Administrator or the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) may require the owner or operator to develop and implement a QIP. Consistent with section 64.6(c)(3) of 40 CFR Part 64, the Part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

b. Elements of a QIP:

i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(a) Improved preventive maintenance practices.

(b) Process operation changes.

(c) Appropriate improvements to control methods.

(d) Other steps appropriate to correct control performance.

(e) More frequent or improved monitoring (only in conjunction with one or more steps under sections A.III.11.b.ii.(a) through (d) above.

c. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

d. Following implementation of a QIP, upon any subsequent determination pursuant to section A.III.9.d.ii of this permit the Administrator or the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

i. Failed to address the cause of the control device performance problems; or

ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

e. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or record keeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[Authority for term: 40 CFR 64.8]

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

12. General record keeping requirements.

a. The owner or operator shall comply with the record keeping requirements specified in section 70.6(a)(3)(ii) of 40 CFR Part 70. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to section A.III.12 of this permit and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable record keeping requirements.

[Authority for term: 40 CFR 64.9(b)]

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of non-complying coatings in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term OAC rule 3745-77-07(C)]

2. The permittee shall submit quarterly deviation reports that identify:

a. all exceedances of the monthly VOC emission limitation of 81,146 pounds.

b. all exceedances of the hourly VOC emission limitation of 72.2 pounds.

[Authority for term OAC rule 3745-77-07(C)]

3. The permittee shall submit annual reports that summarize the actual annual OC and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rules 3745-77-07(C) and 3745-78]

IV. Reporting Requirements (continued)

4. The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period (June 30 and December 31). The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. if there were no deviations from any emission limitations, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

e. For each deviation from an emission limitation (emission limit or operating limit) where CEMS are not used to comply with the emission limitations of 40 CFR 63 Subpart JJJJ, the compliance report must contain the following information:

(i) The total operating time of each affected source during the reporting period.

(ii) The number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(iii) The number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

f. All 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance.

[Authority for term 40 CFR 63.3400(c)]

5. The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

(i) the name, title, and signature of the responsible official who is certifying the accuracy of the report,

(ii) an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and

(iii) if any excess emissions and/or parameter monitoring exceedances have occurred.

[Authority for term 40 CFR 63.6(e)(3) and 40 CFR 63.3400(g)]

IV. Reporting Requirements (continued)

6. The permittee shall immediately report a startup, shutdown, and/or malfunction event to the regulating agency when either of the following scenarios occur:

a. actions taken by the permittee/operator during a startup or shutdown cause the emissions unit(s) to exceed an emission limitation from the NESHAP and procedures specified in the SSMP are not followed; and/or

b. actions taken during a malfunction are not consistent with the procedures specified in the SSMP.

The immediate report shall consist of a telephone call (or facsimile (FAX) transmission) to the director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event. The written report shall contain:
(i) the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy;
(ii) the explanation of the circumstances of the event;
(iii) the reasons for not following the SSMP;
(iv) description of all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions); and
(v) actions taken to minimize emissions in conformance with 40 CFR 63.6(e)(1)(i) and as required in this permit.

[Authority for term 40 CFR 63.10(d)(5)]

7. Performance test results for the emission capture system(s) and add-on control device(s) shall be submitted no later than 30 days after completion of the performance test(s). Results of each performance test shall include the analysis of samples, determination of emissions, and the supporting raw data. Performance testing results shall be retained for a minimum of 5 years from the test date and shall be made available to the director, or representative of the director, upon request.

[Authority for term 40 CFR 63.7(g), 40 CFR 63.3400(f) and OAC rule 3745-15-04(A)]

8. General reporting requirements.

a. On and after the date specified in section A.III.9.a of this permit by which the owner or operator must use monitoring that meets the requirements of 40 CFR Part 64, the owner or operator shall submit monitoring reports to the permitting authority in accordance with section 70.6(a)(3)(iii) of 40 CFR Part 70.

b. A report for monitoring under 40 CFR Part 64 shall include, at a minimum, the information required under section 70.6(a)(3)(iii) of 40 CFR Part 70 and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

iii. A description of the actions taken to implement a QIP during the reporting period as specified in section A.III.10 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[Authority for term: 40 CFR 64.9(a)]

IV. Reporting Requirements (continued)

9. The permittee shall submit quarterly deviation (excursion) reports that includes an identification of all 3-hour periods of operation during which the average thermal incinerator combustion temperature, when the emissions unit was in operation, was less than 1,460 degrees Fahrenheit or below the average temperature recorded during the most recent performance test. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: 40 CFR 64.9(a)]

10. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the air flow indicating strips or other flow indicating device, at any natural draft opening, showed no air flow, air flow in a direction leaving the enclosure, or the pressure differential was less than or equal to 0.007 inch of water column. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

[Authority for term: 40 CFR Part 64.9(a)]

11. The permittee shall notify the permitting authority (the appropriate Ohio EPA District Office or Local Air Agency) upon any establishment or reestablishment of the thermal incinerator's average combustion temperature. The notification shall include the determination of the thermal incinerator's average combustion temperature value. The notification shall be submitted within 30 days following completion of the performance test(s). This notification may be included in the report require by section A.V.2 of this permit.

[Authority for term: 40 CFR 64.6(c)(2)]

V. Testing Requirements

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

1.a Emission Limitation:
The VOC emissions from this emissions unit shall not exceed 72.2 pounds per hour.

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

[Authority for term OAC rule 3745-77-07(C) and PTI 08-1416]

1.b Emission Limitation:
The VOC emissions from this emissions unit shall not exceed 77.9 tons per year.

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

[Authority for term OAC rule 3745-77-07(C) and PTI 08-1416]

V. Testing Requirements (continued)

1.c Emissions Limitation:
The uncontrolled VOC content of the coating applied in this emissions unit shall not exceed 1.0 lbs VOC/gallon, excluding water and exempt solvents.

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

For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formualtion data.

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

[Authority for term OAC rules 3745-77-07(C), 3745-21-09(F), and 3745-21-04(B)(5)]

1.d Emission Limitation:
The overal VOC emissions from this emissions unit shall be reduced by a minimum of 86% efficiency when VOC emissions are vented to the thermal incinerator.

Applicable Compliance Method:
Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in section A.V.2 and monitoring as outlined in Section A.III.3 of this permit.

[Authority for term OAC rule 3745-77-07(C) and PTI 08-1416]

1.e Emissions Limitation:
The controlled VOC content of the coating applied in this emissions unit shall not exceed 1.0 lbs VOC/gallon, excluding water and exempt solvents when the emissions unit is venting to the thermal incinerator.

Applicable Compliance Method:
The permittee shall demonstrate compliance based upon the record keeping requirements specified in section A.III.1 of this permit and emissions testing requirements specified in A.V.2.

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

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 63.3370]

1.f Emission Limitation:
The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20% of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:
Compliance shall be based on the results of emission testing conducted in accordance with the procedures outlined in section A.V.2 and monitoring as outlined in Section A.III.5 of this permit.

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 63.3370]

V. Testing Requirements (continued)

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

a. The emissions testing shall be conducted within two years of permit expiration.

b. The emission testing shall be conducted in order to determine:

(i) the capture efficiency of the emission capture system, and the destruction efficiency of the thermal incinerator, both in percent.

(ii) the minimum operating limits for the thermal incinerator by recording and calculating the average combustion temperature during emissions testing.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;

Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of each add-on control device simultaneously, using:

Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm

Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Emissions units K005 and K007 are both vented to the thermal incinerator, therefore, separate compliance testing will be required:

(i) while both emissions units are operating to determine compliance at maximum operating conditions and;

(ii) while one emissions unit is operating to establish minimum operating temperature limits.

e. Gaseous non-methane organic compound mass flow rates shall be determined simultaneously for the inlet and the outlet of the thermal incinerator for each of 3 test runs.

f. The gaseous non-methane organic compound mass flow rate, in kg/hr or pounds/hour, shall be calculated according to the procedures of 40 CFR 63.3360(e), (Equation 1).

g. For each test run the add-on control device organic emissions destruction or removal efficiency shall be calculated according to the procedures of 40 CFR 63.3360(e), (Equation 2).

V. Testing Requirements (continued)

h. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

[Authority for term OAC rule 3745-77-07(C), 40 CFR 63.3360(e) and 40 CFR 63.7(b)(1)]

VI. Miscellaneous Requirements

1. The carbon adsorption emission controls listed in PTI 08-1416 have been removed from this emissions unit.

[Authority for term OAC rule 3745-77-07(C)]

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #475 COATER (K010)

Activity Description: #475 COATER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
K010 - No. 475 Coater with Flexographic Printing Station - uncontrolled	OAC rule 3745-31-05(A)(3) (PTI 08-04796)	Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-09(F), 3745-21-09(Y) and 40 CFR Part 63, Subparts KK and JJJJ.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid Non-Attainment New Source Review provisions)	The VOC emissions from this emissions unit shall not exceed 15.0 tons per year based upon a rolling 12-month summation.
	OAC rule 3745-21-09(F)	The volatile organic compound (VOC) content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.
	OAC rule 3745-21-09(Y)	See A.I.2.a
	40 CFR Part 63, Subpart KK: NESHAP for Printing and Publishing Industry [40 CFR 63.821(a)(2)(ii)(A)]	See A.I.2.b
	40 CFR Part 63, Subpart JJJJ: NESHAP for Paper and Other Web Coating [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average. See A.I.2.c
	40 CFR Part 63, Subpart A: NESHAP - General Provisions	See Part II.A.2. of this permit and Table 2 to 40 CFR Part 63, Subpart JJJJ.

2. Additional Terms and Conditions

2.a The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year, and therefore, are exempt from the requirements of OAC rule 3745-21-09(Y)(1), per OAC rule 3745-21-09(Y)(2)(b).

[Authority for Term OAC rule 3745-21-09(Y)]

2.b The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print 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 by the press in that month, including all inboard and outboard stations. Provided that the permittee maintains records as required in 40 CFR 63.829(f), the flexographic printing station on this emissions unit is not an affected source subject to the emissions limitations of 40 CFR Part 63, Subpart KK, per 40 CFR 63.821(a)(2)(ii)(A).

[Authority for Term 40 CFR 63.821]

2.c The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart JJJJ.

The final rules found in 40 CFR Part 63, Subpart JJJJ establish emission limitations for hazardous air pollutants (HAP), operating limits and compliance requirements for paper and other web coating operations.

The affected source is the collection of all paper and other web coating lines at the facility. The permittee became subject to the requirements and limitations of this NESHAP on December 5, 2005, at which time the initial compliance period began for the coating operations.

The permittee shall maintain this emissions unit in compliance with the applicable emission limitation in 40 CFR 63.3320 at all times. The permittee has chosen the "as applied compliant coating material" to demonstrate compliance for this emissions unit in accordance with the procedures of 40 CFR 63.3370 at all times.

[Authority for term 40 CFR 63.3320 and 40 CFR 63.3370]

II. Operational Restrictions

1. The total VOC input from flexographic inks, coatings, thinners, and clean up material usage for this emissions unit shall not exceed 30,000 pounds based upon a rolling 12-month summation.

[Authority for Term OAC rule 3745-31-05(C)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.

a. The company identification for each coating, flexographic ink, thinner and cleanup material employed.

b. The number of gallons of each coating, flexographic ink, thinner and cleanup material employed.

c. The VOC content of each coating, as applied, in pounds of VOC per gallon excluding water and exempt solvents.

[Authority for term OAC rule 3745-77-07(C)]

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

2. The permittee shall collect and record the following information each month for this emissions unit.

a. The company identification for each coating, flexographic ink, thinner and cleanup material employed.

b. The number of gallons of each coating, flexographic ink, thinner and cleanup material employed.

c. The VOC content of each coating, flexographic ink, thinner and cleanup material, in pounds per gallon.

d. The VOC emission rate for all coatings, flexographic inks, thinners and cleanup materials, in pounds or tons per month (b x c).

[Authority for term OAC rule 3745-77-07(C)]

3. Per 40 CFR 63.3370(a)(6) affected sources (facilities) using a combination of compliant coatings and control devices to demonstrate compliance with 40 CFR 63.3320(b)(3) shall follow the procedures set out in 40 CFR 63.3370(f) according to 40 CFR 63.3370(n). The coating operations on this emissions unit are uncontrolled, therefore, the capture and control requirements of 40 CFR 63.3370(f) are not applicable. According to 40 CFR 63.3370(n) the permittee shall collect and record the following information each month for this emissions unit.

a. Per 40 CFR 63.3370(n)(4), the total mass of organic HAP applied calculated according to Equation 6 of 40 CFR 63.3370(d).

b. The total mass of organic HAP emitted, calculated according to 40 CFR 63.3370(n)(5)(i), (i.e., the sum of all organic HAP applied on uncontrolled coating operations calculated according to 40 CFR 63.3370(n)(4) plus the organic HAP emissions from coating operations using capture and control calculated according to 40 CFR 63.3370(n)(3)).

c. The total mass of solids applied, calculated according to 40 CFR 63.3370(n)(5)(ii) and 63.3360(d). (i.e., the sum of all coating solids applied).

d. The organic HAP emission rate, in kg of organic HAP per kg of solids applied according to 40 CFR 63.3370(n)(5)(iii) and Equation 9 of 40 CFR 63.3370(h).

[Authority for term 40 CFR 63.3370(n)(4)]

4. According 40 CFR 63.829(f), the owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of Section 63.821(a)(2)(ii)(A) shall maintain the records specified in paragraphs (f)(1) and (f)(2) of this section for five years and submit them to the Administrator and the appropriate Ohio EPA District Office or Local Air Agency upon request:

a. The total mass of each material applied each month on the press, including all inboard and outboard stations, and

b. The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.

[Authority for Term 40 CFR 63.829(f)]

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded 2.9 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[Authority for term OAC rule 3745-77-07(C)]

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports that summarize the actual annual organic compound (OC) and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rule 3745-77-07(C)]

3. The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period (June 30 and December 31). The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. if there were no deviations from any emission limitations, a statement that there were no deviations from the emission limitations during the reporting period.

e. For each deviation from an emission limitation (emission limit or operating limit) where continuous emissions monitoring systems (CEMS) are not used to comply with the emission limitations of 40 CFR 63 Subpart JJJJ, the compliance report must contain the following information:

(i) The total operating time of each affected source during the reporting period.

(ii) The number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(iii) The number, duration, and cause for continuous paramater monitoring system (CPMS) downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

[Authority for term 40 CFR 63.3400(c)]

V. Testing Requirements

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

1.a Emissions Limitation:
The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be based on coating formulation data and if required VOC content shall be determined according the requirements of U.S. Reference Method 24 of 40 CFR Part 60, Appendix A.

[Authority for term OAC rule 3745-77-07(C)]

1.b Emissions Limitation:
The VOC emissions from this emissions unit shall not exceed 15.0 tons per year based upon a rolling 12-month summation.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.2 of this permit and shall be the sum of the monthly emissions rates for the previous twelve months.

[Authority for term OAC rule 3745-77-07(C)]

V. Testing Requirements (continued)

1.c Emissions Limitation:
The combined usage of coatings and inks in the flexographic printing stations on emissions units K004 and K010 shall not exceed 148 tons per year.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.2 of this permit and shall be the sum of all flexographic printing ink used at the facility for the calendar year.

[Authority for term OAC rule 3745-77-07(C)]

2. Emissions Limitation:
The sum of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using product and packaging rotogravure work stations and the total mass of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, and other materials applied by the press using wide-web flexographic print 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 by the press in that month, including all inboard and outboard stations.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.4 according to the requirements of 40 CFR 63.829(f).

[Authority for term OAC rule 3745-77-07(C) and 63.829(f)]

3. Emissions Limitation:
The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 20 percent of the mass of solids applied (0.2 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.3. The organic HAP content, of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(c). The VOC content and coating solids content of the coatings applied in this emissions unit shall be determined according to the requirements of 40 CFR 63.3360(d).

[Authority for term OAC rule 3745-77-07(C) and 40 CFR 63.3360(c)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit K010 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia
TLV (mg/m3): 17.382
Maximum Hourly Emission Rate (lbs/hr): 0.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 75.4
MAGLC (ug/m3): 414

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

IV. Reporting Requirements

1. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BALL MILLS (P002)

Activity Description: BALL MILLS

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P002 Ball mills with baghouse	OAC rule 3745-17-11(B)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 2.39 lbs/hour.
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 8 lbs/hour and 40 lbs/day. See A.I.2.a.
	OAC rule 3745-17-08	See A.I.2.b.
	OAC rule 3745-17-07(B)	See A.I.2.c.
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

2.a The 8 lbs OC/hour limitation exceeds the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limit.

2.b This emissions unit is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), OAC rule 3745-17-08 does not apply to this emissions unit.

2.c Because OAC rule 3745-17-08 is not applicable, this emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(d).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for pressure drop across the baghouse is 2 to 6 inches of water.

The range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

a. The company identification for each coating mixed.

b. The total amount of each coating mixed, in pounds.

c. The total amount of all the coatings mixed, in pounds.

d. The total organic compound emission rate from the coating mixing process, in pounds, calculated as follows:

total OC emissions (lbs/day) = [III.3.c, in pounds of coating mixed per day] X (an emission factor of 0.005 pound OC per pound of coating mixed)*

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. An identification of each day during which the organic compound emissions from the coating mix process exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

b. An identification of all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

1.a Emission Limitation:
2.39 lbs/hour PE

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:
8 lbs/hour OC

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation:
40 lbs/day OC

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

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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

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

[Authority for Term: OAC rule 3745-77-07(A)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: DRUM MIXER (P013)

Activity Description: COATING MIXER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P013 - 55 gallon drum mixer	OAC rule 3745-31-05(A)(3) (PTI 08-03249)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.0 lb/hour, 24 lbs/day and 4.38 tons per year. See A.I.2.a
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The 1.0 lb/hour and 24.0 lbs/day OC emissions limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emissions limits.

II. Operational Restrictions

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-03249]

III. Monitoring and/or Record Keeping Requirements

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

a. The company identification for each coating mixed.

b. The total amount of each coating mixed, in pounds.

c. The total amount of all the coatings mixed, in pounds.

d. The total organic compound emission rate from the coating mixing process, in pounds, calculated as follows:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3249]

IV. Reporting Requirements

1. The permittee shall submit annual reports that summarize the actual annual OC and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rules 3745-77-07(C)]

V. Testing Requirements

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

1.a Emission Limitation:
1.0 lb/hour OC

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-03249]

1.b Emission Limitation:
24 lbs/day OC

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-03249]

1.c Emission Limitation:
4.38 tons/year OC

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-03249]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

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

Activity Description: ADHESIVE COATING MIXER

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
P014 - Coating mix tank #6 with thermal incinerator	OAC rule 3745-31-05(A)(3) PTI 08-04264	The organic compound (OC) emissions from this emissions unit shall not exceed 42.12 lbs/day and 1.46 tons per year. The thermal incinerator shall achieve minimum 92% overall OC emissions reduction (from the mixing operation) and a minimum 97% destruction efficiency.
	OAC rule 3745-21-07(G)	The emissions requirement specified by this rule is less stringent than the emissions requirement established pursuant to OAC rule 3745-31-05(A)(3). See A.I.2.a.

2. Additional Terms and Conditions

2.a OAC rule 3745-21-07(G)(2) limits organic compound (OC) emissions to 8 pounds per hour and 40 pounds per day or requires an 85% reduction in OC emissions. The thermal incinerator is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 8 pounds per hour and 40 pounds per day.

II. Operational Restrictions

1. The average temperature in the combustion chamber of the thermal incinerator in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance. [The most recent emissions test program that demonstrated compliance was conducted on May 11, 2006, with an average combustion chamber temperature of 1,460 degrees Fahrenheit.] This minimum combustion chamber temperature is subject to revision, if emissions testing during the term of this permit demonstrates that the emissions unit is in compliance at a different combustion chamber temperature.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

II. Operational Restrictions (continued)

2. The maximum daily coating mixed for this emissions unit shall not exceed 1640 gallons.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

3. The maximum annual coating mixed for this emissions unit shall not exceed 113,890 gallons.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

III. Monitoring and/or Record Keeping Requirements

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

2. The permittee shall collect and record the following information for each day for the control equipment:

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

3. The permittee shall maintain daily records of the following information for this emissions unit:

a. The amount of coatings mixed, in gallons.

b. The organic compound emission rate (see calculation methodology in section A.V.1.b.), in pounds.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

IV. Reporting Requirements

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

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

b. All exceedances on the restriction of the daily amount of coatings mixed of 1640 gallons.

c. All exceedances of the daily OC emission limitation of 42.12 pounds.

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

IV. Reporting Requirements (continued)

2. The permittee shall submit annual reports that summarize the actual annual organic compound (OC) and VOC emissions from this emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

V. Testing Requirements

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

1.a Emission Limitation:
The thermal incinerator shall achieve minimum 92% overall OC emissions reduction (from the mixing operation) and a minimum 97% destruction efficiency.

Applicable Compliance Method:
Compliance with the destruction efficiency shall be demonstrated in accordance with the test methods and procedures specified in OAC rule 3745-21-10. [Compliance with the overall OC emissions reduction efficiency requirement was demonstrated during a performance test conducted on May 11, 2006 with an overall control efficiency of 95.9%.]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

1.b Emission Limitation:
42.12 lbs OC/day

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

1.c Emission Limitation:
1.46 TPY OC

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

1.d Operational Limitation:
1640 gallons coating mixed/day

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

V. Testing Requirements (continued)

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04264]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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THIS IS THE LAST PAGE OF THE PERMIT

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Statement of Basis For Title V Permit

Part I - General	
Company Name	Troy Laminating and Coating, Inc.
Premise Number	08-55-140-077
What makes this facility a Title V facility?	Individual and combined organic HAP, VOC
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	One new emissions unit (K010) has been added to the permit. Emissions units K001, K003, P011 and the carbon adsorption control system have been have been shut down and removed from the permit. Emissions units K002 has been disconnected from the thermal oxidizer and carbon adsorption system and are now permitted to only employ VOC compliant coatings. Emissions units K005 and K007 have been disconnected from the carbon adsorption control system and are now permitted to use the thermal incinerator control or VOC compliant coatings. Terms addressing NESHAP compliance for emissions units K002, K004, K005, K007 and K010(Paper and Other Web Coating operations;40 CFR 6, Subpart JJJJ); including additional terms to K004 and K010(Printing and Publishing Industry; 40CFR 63, Subpart KK) on these emissions units in Parts II and III. The NESHAP General Provisions and exempt natural gas fired boilers (Industrial and Commercial Boilers; 40 CFR 63, Subpart DDDDD) have been addressed in Part II. The pressure differential requirements for emissions unit P002 have been moved from operational restriction to the monitoring and record keeping requirements. CAM was added for units K005 and K007.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	N	40 CFR 63	40 CFR 63, Subpart JJJJ Emissions Units K002, K005, K005, K007 and K010 comply with the requirements of this rule by using a combination of compliant coatings and a thermal oxidizer. [40 CFR 63.3370(a)(6)]
A.2	N	40 CFR 63	40 CFR 63, Subpart A as defined in Table 2 of 40 CFR Part 63, Subpart JJJJ
A.3	N	40 CFR 63	40 CFR 63, Subpart KK, Emissions units K004 and K010 are equipped with flexographic printing stations, provided that the weight percent of coatings employed in flexographic printing never exceed five weight percent total coating use at the facility on a monthly basis, these emissions units are subject only to the record keeping requirements of 40 CFR 63.829(f). [40 CFR 63.821(a)(2)(ii(A)]
A.4	N	40 CFR 63	40 CFR 63, Subpart DDDDD, All of the boilers in use at this facility are small (< 10 MMBtu) gaseous fuel fired boilers that are affected units but do not have to meet any requirements of the rule. [40 CFR 63.7506(c)(3)]
A.5	31-05	40 CFR 51, Appendix S	Facility wide limit of 495 tons VOC per year to maintain ozone NAAQS attainment.
A.6	17, 21 and 31-05(A)(3)	N	Insignificant emissions units that have applicable requirements in a permit to install or OAC chapters 3745-17, 3745-18 or 3745-21.
B.1	N	Y	List of de minimis emissions units.

C Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K002 K004 K005 K010	2.9 lbs VOC/gallon of coating applied, excluding water and exempt solvents	21-09 (F)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	ET - When requested Method 24 for coating VOC content
K004 K010	148 tons per year flexographic printing ink	21-09 (Y)	N	N	N	Y	N	N	Y	N	Y	N	N	N	Combined flexographic printing ink usage limitation to avoid VOC content restrictions.
K005	2,750 pounds per day and 97.0 tons per year VOC	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency.
K005	Overall VOC emissions reduction of 81% and minimum 90% destruction by weight	21-09 (B)(6)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency.
K007	72.2 pounds per hour and 77.9 tons per year VOC	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency.
K007	1.0 pound VOC per gallon of coating applied, excluding water and exempt solvents	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - 86% by weight VOC emissions reduction, VOC usage shall not exceed 81,146 pounds thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K010	VOC emissions shall not exceed 15.0 tons per year as a rolling 12-month summation	31-05 (C)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - VOC usage shall not exceed 30,000 pounds as a rolling 12-month summation. ET - When requested Method 24 for coating VOC content.
K002 K004 K005 K007 K010	The HAP content of the coating applied shall not exceed 0.2 kg HAP per kilogram of coating solids as a monthly average.	N	40 CFR 63. 3320 (b)(3)	N	Y	M	N	N	Y	N	Y	N	Y	N	OR -combination of "as applied compliant coatings" and "add-on controls", thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance, permanent total enclosure to maintained under negative pressure of at least 0.007 in. water. ET - EPA Reference Methods 24 for VOC content, 25 or 25A for destruction efficiency, 204 for capture efficiency and 311 for organic HAP content.
K005 K007	Compliance Assurance Monitoring	N	40 CFR Part 64	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - compliance with minimum temperature limitation for thermal incinerator and pressure differential for coating station enclosures. M - Includes continuous temperature monitoring fro RTO and daily inspection of coating station enclosures.
P002	Particulate emissions (PE) shall not exceed 2.39 lbs/hour	17-11 (B)(1)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - baghouse pressure differential shall be maintained within 2-6 inches water. ET - when requested pursuant to OAC rule 3745-17-03(B)(10).
P002	Organic compound (OC) emissions shall not exceed 8 lbs/hour and 40 lbs/day.	21-07 (G)(2)	N	Y	N	Y	N	N	Y	N	Y	N	N	N	ND - the 8 lbs OC/hour emissions limitation shall exceeds the potential to emit for this emissions unit.
P002	Visible PE shall not exceed 20% opacity as a sis minute average.	17-07 (A)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	M - baghouse pressure differential shall be maintained within 2-6 inches water. ET - when requested pursuant to OAC rule 3745-17-03(B)(10).
P013	OC emissions shall not exceed 1.0 lb/hour, 24 lbs/day and 4.38 tons per year.	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	The 1.0 lb/hour and 24.0 lbs/day emissions limitation reflect the potential to emit for this emissions unit, therefore, record keeping and reporting requirements for these limits are not required. The emissions limitations established according to this rule are more stringent than the requirements established according to OAC rule 3745-21-07(G)(2).
P014	OC emissions shall not exceed 4212 lbs/day and 1.46 tons per year.	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance. OR - coatings mixed shall not exceed 1,640 gallons per day and 113,890 gallons per year.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P014	Overall OC emissions shall be reduced by a minimum of 92%.	31-05 (A)(3)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - thermal incinerator temperature shall not be lower than the average temperature measured during the last emissions test that showed the emissions unit was in compliance. ET - Compliance was demonstrated during a performance test on May 11, 2006 with an overall control efficiency of 95.9%.

EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

C Instructions for Part III:

C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

  When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be

sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

C Additional information for modifications - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.