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

03/18/08

CERTIFIED MAIL

RE: Preliminary Proposed Title V
Chapter 3745-77 permit

16-52-05-0059
3M Medina
Lane A. Freshwater
P.O. Box 428
Medina, OH 44258-0428

Dear Lane A. Freshwater:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 01/29/08. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **In order to facilitate our review of all the comments or concerns you may have with the enclosed preliminary proposed permit, please provide a hand marked-up copy of the permit showing the changes you think are necessary, along with any additional summary comments, within fourteen (14) days from your receipt of this letter to:**

Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43215

and

Akron Air Pollution Control
146 South High Street, Room 904
Akron, OH 44308
(330) 375-2480

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Sincerely,

Michael W. Ahern

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

cc: Akron Air Pollution Control
File, DAPC PIER

State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 03/18/08	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: 16-52-05-0059 to:

3M Medina
1030 Lake Road
Medina, OH 44256-0428

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

K001 (Vinyl Top-Coating Line)
A converted (2 coating stations) Lembo 6-Color Gravure coater which applies ink receptive coatings to vinyl films with attached drying oven and thermal oxidizer.

K002 (Emulsion Coater 1)
A converted (one coating station) Lembo 5-Color Gravure is used to apply water based pressure sensitive adhesive, dry and laminate. This unit has an attached drying oven.

K003 (Emulsion Coater 2)
Coating and lamination of water based pressure sensitive adhesives with attached drying oven.

K004 (Emulsion Coater 3)
Coating and lamination of water based pressure sensitive adhesives with attached drying oven.

K005 (Solvent Coater)
Pressure sensitive Tape and label adhesives applied to continuous web paper and film substates with attached 4 zone drying oven

L001 (Die Cleaning Station)
Cold solvent cleaning of metal coating die

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 3745-77-04(A) 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:

Akron Air Pollution Control
146 South High Street, Room 904
Akron, OH 44308
(330) 375-2480

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. The following emissions units contained in this permit are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating, 40 CFR Part 63, Subpart JJJJ: K001, K002, K003, K004 and K005. The complete NESHAP requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Akron Regional Air Quality Management District (ARAQMD).

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

Z008 (B001) - Emergency Generator; and
Z009 - Boiler.

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, and 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:

Z001 - slitter #1 - slicing machine used to cut finished product;
Z002 - slitter #2 - slicing machine used to cut finished product;
Z003 - slitter #3 - slicing machine used to cut finished product;
Z004 - slitter #4 - slicing machine used to cut finished product;
Z005 - slitter #5 - slicing machine used to cut finished product;
Z006 - slitter #6 - slicing machine used to cut finished product;
Z007 - slitter #7 - slicing machine used to cut finished product;
Z010 - slitter #8 - slicing machine used to cut finished product;
Z011 - slitter #9 - slicing machine used to cut finished product;
Z012 - unwind station #1;
Z013 - slitter #10 - slicing machine used to cut finished product; and
Z014 - slitter #11 - slicing machine used to cut finished product.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vinyl Top-Coating Line (K001)

Activity Description: A converted (2 coating stations) Lembo 6-Color Gravure coater which applies ink receptive coatings to vinyl films with attached drying oven and thermal oxidizer.

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
vinyl coating line, including a drying oven, controlled by a thermal oxidizer	OAC rule 3745-21-09(H)(2)	The vinyl coating line shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds, as determined under paragraph (C) of rule 3745-21-10 of the Administrative Code: i. a capture efficiency which is at least 75%, by weight; and ii. a control efficiency which is at least 90%, by weight.
	40 CFR Part 63, Subpart JJJJ	You must limit organic HAP emissions no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources. [Authority for term: 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ]
	40 CFR Part 64	Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit. The VOC emissions limitations in OAC rule 3745-21-09(H)(2) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with sections 63.3321(b), 63.3350, 63.3400(C), and 63.3410 of 40 CFR Part 63, Subpart JJJJ.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart A	Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. All of the VOC emissions from emissions units K001 and K005 shall be vented to the thermal oxidizer when one or more of these emissions units are in operation.

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

2. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3321(a), Table 1 to Subpart JJJJ of Part 63—Operating Limits if Using Add-On Control Devices and Capture System, and 40 CFR 63.3360(e)(3) for establishing the operating limits during the performance test)

III. Monitoring and/or Record Keeping Requirements

1. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, in any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(1) and Table 1 to Subpart JJJJ of 40 CFR Part 63]

2. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer 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 installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]

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

3. Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;
b. the magnitude of the deviation at that time;
c. the date the investigation was conducted;
d. the name(s) of the personnel who conducted the investigation; and
e. 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/limit specified in this permit, 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:

f. a description of the corrective action;
g. the date corrective action was completed;
h. the date and time the deviation ended;
i. the total period of time (in minutes) during which there was a deviation;
j. the temperature readings immediately after the corrective action was implemented; and
k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do 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 temperature range/limit 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 permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

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

4. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;

c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

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

[Authority for term: OAC rule 3745-21-09(B)(3)(m) and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit(s) was/were in operation and the VOC emissions were not vented to the thermal oxidizer. Each report shall be submitted within 30 days after the deviation occurs.

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

3. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

V. Testing Requirements

1. 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 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.

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

d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

e. The testing shall be conducted while the emissions unit is operating at or near maximum VOC loading conditions, unless otherwise specified or approved by the Akron Regional Air Quality Management District.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District's refusal to accept the results of the emission test(s).

Personnel from the Akron Regional Air Quality Management District shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.

[Authority for term: OAC rule 3745-21-10(C) and OAC rule 3745-77-07(C)(1)]

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

2.a Emission Limitation:

capture efficiency for VOC emissions which is at least 75%, by weight

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

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

2.b Emission Limitation:

control efficiency for VOC emissions which is at least 90%, by weight

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing in accordance with the requirements specified in section A.V.1.

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

2.c Emission Limitation:

You must limit organic HAP emissions no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated as described in sections 63.3370(e) of 40 CFR Part 63, Subpart JJJJ and section 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(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: Emulsion Coater 1 (K002)

Activity Description: A converted (one coating station) Lembo 5-Color Gravure is used to apply water based pressure sensitive adhesive, dry and laminate. This unit has an attached drying oven.

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
Emulsion Coater #1 - reverse roll emulsion coating line with attached drying oven.	40 CFR Part 60, Subpart RR	See Section A.2.a below.
	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents
	40 CFR Part 63, Subpart JJJJ	You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources. [Authority for term: sections 63.3320(b)(2) & (b)(3) of 40 CFR Part 63, Subpart JJJJ]
	40 CFR Part 63, Subpart A	Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

2. Additional Terms and Conditions

2.a Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to section 60.442(a) and all other sections of 40 CFR Part 60, Subpart RR.

[Authority for term: section 60.440(b) of 40 CFR Part 60, Subpart RR]

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:

a. the name and identification number of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-21-09(B)(3)(f) and OAC rule 3745-77-07(C)(1)]

2. The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section 40.446(a) of 40 CFR Part 60, Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: section 60.445(a) of 40 CFR Part 60, Subpart RR]

3. The owner or operator of an affected facility operating at the conditions specified in section 60.440(b) of 40 CFR Part 60, Subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

[Authority for term: section 60.445(d) of 40 CFR Part 60, Subpart RR]

4. Records of the measurements required in sections A.III.2 through A.III.3 of these terms and conditions must be retained for at least two years following the date of the measurements.

[Authority for term: section 60.445(h) of 40 CFR Part 60, Subpart RR]

5. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3360(c) - (d), 40 CFR 63.3370(b)-(d), and 40 CFR 63.3410(a)).

IV. Reporting Requirements

1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Akron Regional Air Quality Management District within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g) and OAC rule 3745-77-07(C)(1)]

2. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-21-10(B) and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of sections A.III.2 and A.III.3 of these terms and conditions.

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

1.c Emission Limitations:

You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitations shall be demonstrated as described in sections 63.3370(b)-(d) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(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: Emulsion Coater 2 (K003)

Activity Description: Coating and lamination of water based pressure sensitive adhesives with attached drying oven.

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
K003 - Coater with drying oven and laminating station - Emulsion Coater Number 2.	OAC rule 3745-31-05(A)(3) (PTI 16-02375)	65.0 pounds of organic compounds (OC) per hour for coatings The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F), OAC rule 3745-31-05(C), 40 CFR Part 60, subpart RR, and 40 CFR Part 63, subpart JJJJ.
	OAC rule 3745-31-05(C) (to avoid being a major modification under the nonattainment provisions listed in Chapter 3745-31)	The annual OC input rate* and the annual OC emissions each shall not exceed 32.6 tons of OC per rolling, 12-month summation (from coatings and cleanup materials) (see section A.I.2.b below). *Annual coatings and cleanup materials usage is based upon a OC input rate that is equivalent to the annual OC emission rates and is based upon the following: OC input rate = (C) x (D) where C = the number of gallons of each coating and cleanup material employed and D = the OC content of each coating and clean up material employed in pounds of OC per gallon of coating and clean up material where 100% of the solvents in the coating and clean up materials employed is emitted.
	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents
	40 CFR Part 60, Subpart RR	See section A.I.2.c below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart JJJJ	You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources. [Authority for term: sections 63.3320(b)(2) & (b)(3) of 40 CFR Part 63, Subpart JJJJ]
	40 CFR Part 63, Subpart A	Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

2. Additional Terms and Conditions

2.a The hourly allowable OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with this limitation.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2.b Both the annual combined coating and cleanup material usage OC input rate* and the annual emissions of OC from this emissions unit shall not exceed 32.6 tons per year, based upon a rolling, 12-month summation of the monthly OC input rates and OC emissions, respectively. The permittee has existing coating and cleanup material usage OC input* records and therefore does not need to be limited to first year monthly coating and cleanup material usage OC input* amounts.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2.c Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to section 60.442(a) and all other sections of 40 CFR Part 60, Subpart RR.

[Authority for term: section 60.440(b) of 40 CFR Part 60, Subpart RR]

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:

a. the name and identification number of each coating, as applied;

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

c. the OC content of each coating, in pounds per gallon or weight fraction, as applied;

d. the number of gallons or pounds of each coating employed;

e. the name and identification of each cleanup material employed;

f. the OC content of each cleanup material, in pounds per gallon or weight fraction;

g. the number of gallons or pounds of each cleanup material employed;

h. the total OC input amounts* and the total OC emissions, in tons, from all the coatings and cleanup materials employed; and

i. the rolling, 12-month OC input rate* and the total OC emissions, in tons, from all the coatings and cleanup materials employed.

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section 40.446(a) of 40 CFR Part 60, Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: section 60.445(a) of 40 CFR Part 60, Subpart RR]

3. The owner or operator of an affected facility operating at the conditions specified in section 60.440(b) of 40 CFR Part 60, Subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

[Authority for term: section 60.445(d) of 40 CFR Part 60, Subpart RR]

4. Records of the measurements required in sections A.III.2 through A.III.3 of these terms and conditions must be retained for at least two years following the date of the measurements.

[Authority for term: section 60.445(h) of 40 CFR Part 60, Subpart RR]

5. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3360(c) - (d), 40 CFR 63.3370(b)-(d), and 40 CFR 63.3410(a)).

IV. Reporting Requirements

1. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content) from this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Akron RAQMD) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of both the rolling, 12-month OC emission limitation of 32.6 tons (from coatings and cleanup materials usages) and the rolling, 12-month OC input rate of 32.6 tons (from coatings and cleanup materials usages).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

5. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

V. Testing Requirements

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

1.a Emission Limitation:

65.0 pounds of OC per hour for coatings

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum pounds of coatings applied per hour by the maximum OC weight fraction of all the coatings.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

The annual OC input rate* and the annual OC emissions each shall not exceed 32.6 tons of OC per rolling, 12-month summation (from coatings and cleanup materials)

Applicable Compliance Method:

Compliance with the limitations above shall be demonstrated in accordance with the monthly record keeping requirements specified in section A.III.1 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.c Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

[Authority for term: OAC rule 3745-21-10(B), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

1.d Emission Limitation:

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of sections A.III.2 and A.III.3 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

1.e Emission Limitations:

You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitations shall be demonstrated as described in sections 63.3370(b)-(d) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(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: Emulsion Coater 3 (K004)

Activity Description: Coating and lamination of water based pressure sensitive adhesives with attached drying oven.

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
Emulsion Coater #3 - application of reverse roll coating with water-based pressure sensitive adhesive and laminate to various types of polycoated liners, polyesters, vinyls, polystyrenes, super calendared papers, papers and paper foils, dried with a natural gas-fired oven, air emissions of organic compounds (OCs) uncontrolled and vented to a roof stack	OAC rule 3745-31-05(A)(3) (PTI 16-02229)	0.899 pound of organic compounds (OC) per gallon of coating, as applied after final formulation, excluding water and exempt solvents 40.01 tons per year of OC from coatings and cleanup materials The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, subpart RR.
	40 CFR Part 60, Subpart RR	See Section A.2.a below.
	OAC rule 3745-21-09(F)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart JJJJ	You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources. [Authority for term: sections 63.3320(b)(2) & (b)(3) of 40 CFR Part 63, Subpart JJJJ]
	40 CFR Part 63, Subpart A	Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

2. Additional Terms and Conditions

2.a Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR. If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line will become subject to section 60.442(a) and all other sections of 40 CFR Part 60, Subpart RR.

[Authority for term: section 60.440(b) of 40 CFR Part 60, Subpart RR]

II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in the drying oven for this emissions unit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record each month the following information for the coating line:

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

b. the OC content of each coating employed, in pound(s) per gallon, as applied after final formulation, excluding water and exempt solvents.

[Note: For the purposes of this section, formulation data may be used to determine the OC content of each coating employed.]

[Authority for term: OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. The owner or operator of an affected facility subject to 40 CFR Part 60, Subpart RR shall maintain a calendar month record of all coatings used and the results of the reference test method specified in section 40.446(a) of 40 CFR Part 60, Subpart RR or the manufacturer's formulation data used for determining the VOC content of those coatings.

[Authority for term: section 60.445(a) of 40 CFR Part 60, Subpart RR]

3. The owner or operator of an affected facility operating at the conditions specified in section 60.440(b) of 40 CFR Part 60, Subpart RR shall maintain a 12 month record of the amount of solvent applied in the coating at the facility.

[Authority for term: section 60.445(d) of 40 CFR Part 60, Subpart RR]

4. Records of the measurements required in sections A.III.2 through A.III.3 of these terms and conditions must be retained for at least two years following the date of the measurements.

[Authority for term: section 60.445(h) of 40 CFR Part 60, Subpart RR]

5. The permittee shall collect and record each month the following information for the purpose of determining annual OC emissions:

a. the name and identification of each coating and cleanup material employed;

b. the OC content of each coating and cleanup material, in pound(s) per gallon or weight fraction;

c. the number of gallons or pounds of each coating and cleanup material employed; and

d. the total OC emissions from all coatings and cleanup materials employed, in tons.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

6. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3360(c) - (d), 40 CFR 63.3370(b)-(d), and 40 CFR 63.3410(a)).

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-21-09(B)(3)(g), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

3. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

V. Testing Requirements

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

1.a Emission Limitation:

0.899 pound of OC per gallon of coating, as applied after final formulation, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.1 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

40.01 tons per year of OC from coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section A.III.5 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

1.c Emission Limitation:

Any affected facility which inputs to the coating process 45 Mg (50 tons) of VOC or less per 12 month period is not subject to the emission limits of section 60.442(a), however, the affected facility is subject to the requirements of all other applicable sections of 40 CFR Part 60, Subpart RR.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of sections A.III.2 and A.III.3 of these terms and conditions.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

1.d Emission Limitations:

You must limit organic HAP emissions to either no more than 4 percent of the mass of coating materials applied for each month at existing affected sources or no more than 20 percent of the mass of coating solids applied for each month at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitations shall be demonstrated as described in sections 63.3370(b)-(d) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-77-07(C)(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
Emulsion Coater #3 - application of reverse roll coating with water-based pressure sensitive adhesive and laminate to various types of polycoated liners, polyesters, vinyls, polystyrenes, super calendared papers, papers and paper foils, dried with a natural gas-fired oven, air emissions of organic compounds (OCs) uncontrolled and vented to a roof stack	none	See Part III, B.III.1 through 3 below.

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 was evaluated based on the actual coatings and cleanup materials employed, 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 Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethyl acetate (CAS 141-78-6)
TLV (ug/m3): 1,440,000
Maximum Hourly Emission Rate (lbs/hr): 22.5
Predicted 1-Hour Maximum Ground-Level Concentration at 139 m (ug/m3): 2106
MAGLC (ug/m3): 34,286

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

a. changes in the composition of the materials used (process materials and cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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.).

If the permittee determines that the "Air Toxics Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxics Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxics Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Solvent Coater (K005)

Activity Description: Pressure sensitive Tape and label adhesives applied to continuous web paper and film substates with attached 4 zone drying oven

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
Solvent Coater - pressure sensitive tape & label adhesives applied to continuous web paper and film substrates, dried with rated 9.0 MM Btu/hr, natural gas-fired direct heat transfer oven, air emissions of volatile organic compounds (VOC) and organic hazardous air pollutants (HAPs) captured, vented to and destroyed by a natural gas-fired thermal oxidizer employing a 96% overall capture and control system (Modified).	OAC rule 3745-31-05(A)(3) (PTI 16-02263)	51.4 lbs/hr & 112.57 tons per year (tpy) of volatile organic compounds (VOC) emissions (thermal oxidizer stack emissions); 96% overall VOC emission reduction, by weight; Note: All VOC emissions are considered to be organic HAP emissions. 0.1 lb/hr & 0.4 tpy of particulate emissions (PE) (thermal oxidizer stack emissions); 13.2 lbs/hr & 57.8 tpy of nitrogen oxides (NOx) emissions (thermal oxidizer stack emissions); 8.26 lbs/hr & 36.2 tpy of carbon monoxide (CO) emissions (thermal oxidizer stack emissions); and The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart JJJJ.
	40 CFR Part 63, Subpart JJJJ	You must limit organic HAP emissions no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources. [Authority for term: 63.3320(b)(1) of 40 CFR Part 63, Subpart JJJJ]

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-09(B)(6) in lieu of OAC rule 3745-21-09(F)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60 Subpart RR	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 64	Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 shall not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart JJJJ specified in this permit. The VOC emissions limitations in OAC rule 3745-31-05(A)(3) shall be in compliance with the CAM requirements of 40 CFR Part 64 by complying with sections 63.3321(b), 63.3350, 63.3400(C), and 63.3410 of 40 CFR Part 63, Subpart JJJJ.
	40 CFR Part 63, Subpart A	Table 2 to Subpart JJJJ of Part 63 - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ shows which parts of the General Provisions in sections 63.1 - 63.15 of 40 CFR Part 63, Subpart A apply.

2. Additional Terms and Conditions

2.a The hourly VOC, PM, NOx, and CO emission limitations were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increase(s) the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

2.b The permittee shall properly install, adjust, operate, and maintain, in accordance with the manufacturer's recommendations, instructions, and operating manual(s), a thermal oxidizer and associated control equipment as necessary to adequately capture, contain, vent, and destroy air emissions of VOCs and HAPs from this emissions unit as required by this permit and to the extent possible with good engineering design and practice.

II. Operational Restrictions

1. The thermal oxidizer with all associated control equipment serving this emissions unit shall be in operation at all times the emissions unit is in operation and coating raw materials. If the thermal oxidizer or any of its associated control equipment malfunctions or must be shut down for any reason, the emissions unit shall immediately cease coating until effective repairs are made. Once coating has ceased, the line may continue operating until the coated material is through the oven. Normal operation does not include oven startup before coating begins.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

2. The emissions unit, vented to the thermal oxidizer as required in normal operation, shall only vent directly to ambient air (e.g., through a bypass stack) during emergency conditions as detected by Lower Explosive Level (LEL) instrumentation and the direct venting to ambient air shall only occur until the emissions unit safely ceases coating raw material. The emissions unit shall remain shut down until the reason for the LEL emergency condition has been effectively identified and corrected and the emissions unit can resume normal operations, venting to the thermal oxidizer.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

3. The permittee shall store all waste materials in closed containers with tightly fitted covers.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

4. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3321(a), Table 1 to Subpart JJJJ of Part 63—Operating Limits if Using Add-On Control Devices and Capture System, and 40 CFR 63.3360(e)(3) for establishing the operating limits during the performance test)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall document all times the thermal oxidizer and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, in any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, must not fall below 1525 degrees Fahrenheit or below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-77-07(C)(1) and Table 1 to Subpart JJJJ of 40 CFR Part 63]

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer 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 installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(B)(3)(l) and OAC rule 3745-77-07(C)(1)]

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

4. Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range/limit specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;
b. the magnitude of the deviation at that time;
c. the date the investigation was conducted;
d. the name(s) of the personnel who conducted the investigation; and
e. 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/limit specified in this permit, 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:

f. a description of the corrective action;
g. the date corrective action was completed;
h. the date and time the deviation ended;
i. the total period of time (in minutes) during which there was a deviation;
j. the temperature readings immediately after the corrective action was implemented; and
k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do 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 temperature range/limit 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 permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for the controlled emissions unit(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

5. The permittee shall collectand record each month the following information for the purpose of determining annual VOC emissions:

a. the name and identification number of each coating, as applied;

b. the VOC content of each coating, as applied, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the name and identification of each cleanup material employed;

e. the VOC content of each cleanup material, in pounds per gallon;

f. the number of gallons of each cleanup material employed;

g. the total uncontrolled VOC emissions from all the coatings and cleanup materials employed [summation of (b x c) for all coatings+ summation of (e x f) for all cleanup materials], in pounds or tons; and

h. the calculated, controlled VOC emission rate for all the coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

6. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3350(e)-(f) and 40 CFR 63.3410(a)).

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, fell below 1525 degrees Fahrenheit or fell below the combustion temperature limit established according to section 63.3360(e)(3)(i) of 40 CFR Part 63, Subpart JJJJ;

c. an identification of each incident of deviation described in "b" (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in "b" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in "b" where proper records were not maintained for the investigation and/or the corrective action(s).

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

[Authority for term: OAC rule 3745-21-09(B)(3)(m), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit deviation (excursion) reports that identify any time periods when the thermal oxidizer and/or associated control equipment serving this emissions unit were/was not employed when the emissions unit was in operation. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

4. See 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3400(a) - (g)).

V. Testing Requirements

1. 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 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the 96% overall VOC emission reduction requirement.

[Note: Compliance with the 95% overall HAP emission reduction requirement is assumed if the permittee demonstrates compliance with the 96% overall VOC emission reduction requirement.]

c. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron Regional Air Quality Management District.

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

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

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District's refusal to accept the results of the emission test(s).

f. Personnel from the Akron Regional Air Quality Management District 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.

V. Testing Requirements (continued)

g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron Regional Air Quality Management District within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the from the Akron Regional Air Quality Management District.

[Authority for term: OAC rule 3745-21-10(C) and OAC rule 3745-77-07(C)(1)]

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

2.a Emission Limitations:

0.1 lb/hr & 0.4 tpy of PE (thermal oxidizer stack emissions)

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2.b Emission Limitations:

51.4 lbs/hr & 112.57 tpy of VOC emissions (thermal oxidizer stack emissions)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2.c Emission Limitation:

96% overall VOC emission reduction, by weight

Applicable Compliance Method:

The permittee shall demonstrate compliance with the VOC emission reduction requirement of 96%, by weight, based on the results of emission testing conducted in accordance with the methods as outlined in Section A.V.1 of this permit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

2.d Emission Limitations:

13.2 lbs/hr & 57.8 tpy of NOx emissions (thermal oxidizer stack emissions).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation based on the results of emission testing conducted in accordance with Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2.e Emission Limitations:

8.26 lbs/hr & 36.2 tpy of CO emissions (thermal oxidizer stack emissions).

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation based on the results of emission testing conducted in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A, or other US EPA-approved test methods.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

2.f Emission Limitation:

You must limit organic HAP emissions no more than 5 percent of the organic HAP applied for each month (95 percent reduction) at existing affected sources.

Applicable Compliance Method:

Compliance with the emission limitation shall be demonstrated as described in sections 63.3370(e) of 40 CFR Part 63, Subpart JJJJ and section 63.3370(k) of 40 CFR Part 63, Subpart JJJJ.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(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: Die Cleaning Station (L001)

Activity Description: Cold solvent cleaning of metal coating die

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
Die Cleaning Station - cold solvent cleaning of metal coating die, air emissions of volatile organic compounds (VOC) and organic hazardous air pollutants (HAPs) captured and vented to a roof stack.	OAC rule 3745-31-05(A)(3) (PTI 16-02263)	4 ton per year of volatile organic compounds (VOC) emissions. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O).
	OAC rule 3745-21-09(O)	See A.I.2.a through A.I.2.d below.

2. Additional Terms and Conditions

2.a The cold cleaner shall be operated with a cover, and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute, measured at 100 degrees Fahrenheit or, if the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

2.b The cold cleaner shall be equipped with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100 degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

2.c The cold cleaner shall be maintained with a freeboard ratio equal to or greater than 0.7.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

2. Additional Terms and Conditions (continued)

2.d The cold cleaner shall be operated and maintained in accordance with the following practices to minimize solvent evaporation from the unit:

i. Provide a permanent, legible, conspicuous label, summarizing the operating requirements.

ii. Store waste solvent in covered containers.

iii. Close the cover whenever parts are not being handled in the cleaner.

iv. Drain the cleaned parts until dripping ceases.

v. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge.

vi. Clean only materials that are neither porous nor absorbent.

[Authority for term: OAC rule 3745-21-09(O)(2), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(A)(1)]

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records for at least five years of the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit, and make these records available to the Director upon verbal or written request.

[Authority for term: OAC rule 3745-21-09(O)(5), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

2. The permittee shall maintain records of the following information, collected at the end of each year:

a. the total cleaning solvent added to the cold cleaner or the amount purchased for use in the emissions unit during the year;

b. the total amount of solvent collected for disposal and/or recovery and shipped off-site during the year; and

c. the estimated annual VOC emissions from this emissions unit, calculated using the difference between the solvent used or purchased and the used solvent shipped offsite, adjusting the units to calculate the emissions in tons/year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 30 of each year.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

4 ton per year of VOC emissions

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the record keeping requirements in section A.III.2 of these terms and conditions.

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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