



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

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

06/30/03

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-03-01-0045
Hedstrom Corporation
Kathy Ramsey
710 Orange Street
Ashland, OH 44805-1725

Dear Kathy Ramsey:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

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

If you have any questions or comments concerning this draft Title V permit, please contact Northwest District Office.

Very truly yours,

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

cc: USEPA (electronically submitted)
File, DAPC PMU
Northwest District Office



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/30/03

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: 03-03-01-0045 to: Hedstrom Corporation, 710 Orange Street, Ashland, OH 44805-1725

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units like P021 (Powder Blending), R005 (6 inch 360 Printer), R006 (Hand Splatter Decorator Booth), R007 (Semi-Automatic Decorator #1), R008 (Semi-Automatic Decorator #2), R031 (Printer #3 - Top), R032 (Printer #3 - Bottom), R033 (Printer #1 - Top), R034 (Printer #1 - Bottom), R035 (10-inch Lacquer Line #1), R036 (10-inch Lacquer Line #2), R038 (4-inch Lacquer Line), R039 (6-inch Lacquer Line), R040 (9.5" Tampo Printer #1), R041 (9.5" Tampo Printer #2), and R042 (9.5" Tampo Printer #3).

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

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

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
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, 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. 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))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. 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. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii)

pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))

- (b) 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 deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement 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. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

- 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))

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit(s) 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 OAC rule 3745-15-06, 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).

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

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:

1. 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
2. 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.

(Authority for term: OAC rule 3745-77-07(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 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 emission 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

(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

Each insignificant activity 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))

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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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 Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

B003 Boiler #2
B004 Boiler #3
B005 Boiler #4
B006 Boiler #5
P001 Rotocast Machine #1
P002 Rotocast Machine #4
P003 Rotocast Machine #5
P004 Rotocast Machine #3
P005 Rotocast Machine #2
P006 Rotocast Machine #6
P008 Mold Cleanining Oven
R037 4" 360 Degree Printer #2
T001 #2 Fuel Oil Storage Tank (Tank 1)
T002 Alcohol Storage Tank (Tank 2)
T003 MEK Storage Tank (Tank 3)
T004 Naptha Storage Tank (Tank 4)
T005 #2 Fuel Oil Storage Tank (Tank 5)
T006 #2 Fuel Oil Storage Tank (Tank 6)
Z001 5" Tampo Printer #1
Z002 5" Tampo Printer #2
Z003 5" Tampo Printer #3
Z004 5" Tampo Printer #4
Z008 Rotocast Machine #7
Z009 Rotocast Machine #8
Z010 Rotocast Machine #9
Z011 Rotocast Machine #10
Z015 Vinyl Compound Storage Tank (Tank 8)
Z016 Vinyl Compound Storage Tank (Tank 9)
Z017 Vinyl Compound Storage Tank (Tank 10)
Z018 DINP Storage Tank (Tank 11)
Z019 DINP Storage Tank (Tank 12)
Z020 DINP Storage Tank (Tank 13)
Z021 DINP Storage Tank (Tank 14)
Z022 DINP Storage Tank (Tank 15)
Z023 PVC Grinder
Z024 Plastic Extruder
Z025 Pigment Mixer #1
Z026 Pigment MIxer #2
Z027 Tote Mixer
Z028 Athletic Compound Holding Tanks (26)
Z029 Lacquer Holding Tanks (3)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations as well as any emission limitations and/or control requirements contained within a PTI for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Powder Blending (P021)
Activity Description: Powder Blending Mixers with Baghouse

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
powder blending line	OAC rule 3745-31-05 (A)(3) (PTI #03-13888)	0.01 gr particulate emissions (PE)/dscf 0.39 lb PE/hr 1.71 tons PE/yr See A.I.2.a. There shall be no visible particulate emissions from the baghouse exhaust.

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

OAC rule 3745-17-11 (B)

See A.I.2.b

OAC rule 3745-17-07 (A)

See A.I.2.b

2. Additional Terms and Conditions

- 2.a** Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the use of a baghouse with a maximum outlet concentration of 0.01 gr/dscf.
- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range 0.5-4.0 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c.ii of the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a** Emission Limitation:
0.39 lb PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the manufacturer's guaranteed maximum outlet grain loading concentration (0.01 gr/dscf) by the maximum volumetric air flow rate for the baghouse (4500 acfm) and converting this value to pounds/hour by multiplying by 60 min/hr and dividing by 7000 gr/lb. If required, compliance with this limitation shall be based on stack testing using methods and procedures specified in 40 CFR Part 60, Appendix A- Methods 1-5.

V. Testing Requirements (continued)

1.b Emission Limitation:
1.71 tons PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by multiplying the pound/hr limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

1.c Emission Limitation:
0.01 gr PE/dscf

Applicable Compliance Method:

If required, compliance with this limitation shall be based on stack testing using methods and procedures specified in 40 CFR Part 60, Appendix A- Methods 1-5.

1.d Emission limitation:
There shall be no visible particulate emissions from the baghouse exhaust.

Applicable Compliance Method:

If required, compliance with this limitation shall be based on 40 CFR Part 60, Appendix A- Method 22.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: 6 inch 360 Printer (R005)

Activity Description: 6 inch 360 degree Tampo Printer Associated with Ink Mixing. (previously spray booths ID#s 25001& 25002, removed in 1981; and horse paint spray booth #5, installed in 1995 and removed in 2001)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6 inch 360 degree printer with dry filtration	OAC rule 3745-21-07 (G)(2)	8 lbs organic compounds (OC)/hr 40 lbs OC/day
	OAC rule 3745-17-11 (A)	none (See A.1.2.a)
	OAC rule 3745-17-07 (A)	none (See A.1.2.b)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Ashland County.
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - 1.a the company identification for each ink and photochemically reactive cleanup material employed;
 - 1.b the number of gallons of each ink and photochemically reactive cleanup material employed;
 - 1.c the OC content of each ink and photochemically reactive cleanup material, in pounds per gallon;
 - 1.d the total OC emission rate for all inks and photochemically reactive cleanup materials, in pounds per day;
 - 1.e the total number of hours the emissions unit was in operation; and

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

- 1.f** the average hourly OC emission rate for all inks and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hours (average).

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

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which identify the following information:
- 1.a** An identification of each day during which the average hourly organic compound emissions from the inks and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
- 1.b** An identification of each day during which the organic compound emissions from the inks and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit, paragraph A.1.c.ii.

V. Testing Requirements

- 1.** Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
- 1.a** Emission Limitation:
8 lbs OC/hr, 40 lbs OC/day
- Applicable Compliance Method:
The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.
- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC content of the inks.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: Hand Splatter Decorator Booth (R006)

Activity Description: Hand Splatter Spray Booth Associated with Paint Mixing. (previously spray booths ID#s 25006 & 25007, removed in 1981; and horse paint spray booth #6, installed in 1995 and removed in 2001)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hand splatter decorator spray booth (spray booth #4) with dry filtration	OAC rule 3745-21-07 (G)	None (See A.II.1.)
	OAC rule 3745-17-11 (A)	None (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	None (See A.I.2.b)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - 1.a The company identification for each coating and cleanup material employed;
 - 1.b Documentation on whether or not each coating and clean up material is photchemically reactive.

IV. Reporting Requirements

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

V. Testing Requirements

None

Facility Name: **Hedstrom Corporation**
Facility ID: **03-03-01-0045**
Emissions Unit: **Hand Splatter Decorator Booth (R006)**

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: Semi-Automatic Decorator #1 (R007)

Activity Description: Not Currently Operational. Semi-Automatic Decorator Spray Booth Associated with Paint Mixing. (previously spray booth ID# 25013 and Heated MeCl Dip Tank, which was removed in 1996)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
semi-automatic decorator 1 with dry filtration	OAC rule 3745-21-07 (G)	None (See A.II.1.)
	OAC rule 3745-17-11 (A)	None (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	None (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - 1.a The company identification for each coating and cleanup material employed;
 - 1.b Documentation on whether or not each coating and clean up material is photchemically reactive.

IV. Reporting Requirements

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

V. Testing Requirements

None

Facility Name: **Hedstrom Corporation**
Facility ID: **03-03-01-0045**
Emissions Unit: **Semi-Automatic Decorator #1 (R007)**

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: Semi-Automatic Decorator #2 (R008)

Activity Description: Not Currently Operational. Semi-Automatic Decorator Spray Booth Associated with Paint Mixing. (previously spray booth ID# 20105 in Vinyl Ball Dept)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
semi-automatic decorator #2 with dry filtration	OAC rule 3745-21-07 (G)	None (See A.II.1.)
	OAC rule 3745-17-11 (A)	None (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	None (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - 1.a The company identification for each coating and cleanup material employed;
 - 1.b Documentation on whether or not each coating and clean up material is photchemically reactive.

IV. Reporting Requirements

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

V. Testing Requirements

None

Facility Name: **Hedstrom Corporation**
Facility ID: **03-03-01-0045**
Emissions Unit: **Semi-Automatic Decorator #2 (R008)**

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: Maintenance Decorator (R009)

Activity Description: Maintenance Samples Decorator Spray Booth. (previously spray booth ID# 20066 in Vinyl Ball Dept)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
maintenance decorator with dry filtration	OAC rule 3745-21-07 (G)	None (See A.II.1.)
	OAC rule 3745-17-11 (A)	None (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	None (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - 1.a The company identification for each coating and cleanup material employed;
 - 1.b Documentation on whether or not each coating and clean up material is photochemically reactive.

IV. Reporting Requirements

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

V. Testing Requirements

None

Facility Name: **Hedstrom Corporation**
Facility ID: **03-03-01-0045**
Emissions Unit: **Maintenance Decorator (R009)**

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: Printer #3 - Top (R031)

Activity Description: 10 inch 360 degree Printer Associated with Ink Mixing - Top

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch 360 degree printer (#3- Top) with dry filtration	OAC rule 3745-31-05 (A)(3) (PTI #03-10174)	0.1 lb particulate emissions (PE)/hr See A.I.2.a.
	OAC rule 3745-21-07 (G)(2)	8.0 lbs organic compounds (OC)/hr 40 lbs OC/day (includes cleanup) (See A.I.2.b.)
	OAC rule 3745-17-11 (B)(2)	See A.I.2.c.
	OAC rule 3745-17-07 (A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07 (G)(2) and 3745-17-07(A).
- 2.b The hourly and daily emission limitations for organic compounds apply to all inks and cleanup materials employed in this emissions unit.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 1.a the company identification for each ink and cleanup material employed;
 - 1.b the number of gallons of each ink and cleanup material employed;
 - 1.c the organic compound content of each ink and cleanup material, in pounds per gallon;

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

- 1.d** the organic compound emission rate for each ink and cleanup material, in pounds per day (b X c);
- 1.e** the total organic compound emission rate for all inks and cleanup materials, in pounds per day (sum of d);
- 1.f** the total number of hours the emissions unit was in operation; and
- 1.g** the average hourly organic compound emission rate for all inks and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

- 2.** The permittee shall maintain daily records that document any time periods when the dry filtration system was not in operation.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which identify the following information:
 - 1.a** An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - 1.b** An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit, paragraph A.1.c.ii.

- 2.** The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

V. Testing Requirements

- 1.** Compliance with the emissions limitations in section A.I.1. of this permit to install shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.1 lb PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by employing the following equation:

$E = \text{particulate emission rate (lbs/hr)}$

$E = \text{maximum coating solids usage (lbs/hr)} \times (1-TE) (1-CE)$

where,

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 90 percent)

CE = control efficiency of the control equipment (assumed to be 90 percent)

If required, the permittee shall demonstrate compliance with the above emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.b** Emission Limitation:
8.0 lbs OC/hr, 40.0 lbs OC/day;

Applicable Compliance Method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

- 1.c** Emission Limitation:
Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance pursuant to the methods specified in OAC rule 3745-17-03 (B)(1).

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of the inks and clean up materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch 360 degree printer with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R031 & R032 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by the emissions units 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: MIBK*

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 16

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9,444

MAGLC (ug/m3): 20,500

* The following additional conservative assumptions were made in the Screen modeling:

For emission units R031 & R032, all emissions of toxic compounds in the coatings were assumed to be MIBK which has the lowest TLV of the remaining toxic compounds.

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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

- 1.a** changes in the composition of the materials used (typically for coatings or 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;
- 1.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
- 1.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 Toxic 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the "Air Toxic 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 Toxic 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 Toxic 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: Printer #3 - Bottom (R032)

Activity Description: 10 inch 360 degree Printer Associated with Ink Mixing - Bottom

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch 360 degree printer with dry filtration (#3-Bottom)	OAC rule 3745-31-05 (A)(3) (PTI #03-10174)	0.1 lb particulate emissions (PE)/hr See A.I.2.a.
	OAC rule 3745-21-07 (G)(2)	8.0 lbs organic compounds (OC)/hr 40 lbs OC/day (includes cleanup) (See A.I.2.b.)
	OAC rule 3745-17-11 (B)(2)	See A.I.2.c.
	OAC rule 3745-17-07 (A)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-17-07(A).
- 2.b The hourly and daily emission limitations for organic compounds apply to all inks and cleanup materials employed in this emissions unit.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - 1.a the company identification for each ink and cleanup material employed;
 - 1.b the number of gallons of each ink and cleanup material employed;
 - 1.c the organic compound content of each ink and cleanup material, in pounds per gallon;

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

- 1.d** the organic compound emission rate for each ink and cleanup material, in pounds per day (b X c);
- 1.e** the total organic compound emission rate for all inks and cleanup materials, in pounds per day (sum of d);
- 1.f** the total number of hours the emissions unit was in operation; and
- 1.g** the average hourly organic compound emission rate for all inks and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

- 2.** The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which identify the following information:
 - 1.a** An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - 1.b** An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit, paragraph A.1.c.ii.

- 2.** The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

V. Testing Requirements

- 1.** Compliance with the emissions limitations in section A.I.1. of this permit to install shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.1 lb PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation by employing the following equation:

$E = \text{particulate emission rate (lbs/hr)}$

$E = \text{maximum coating solids usage (lbs/hr)} \times (1-TE) (1-CE)$

where,

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 90 percent)

CE = control efficiency of the control equipment (assumed to be 90 percent)

If required, the permittee shall demonstrate compliance with the above emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

- 1.b** Emission Limitation:
8.0 lbs OC/hr, 40.0 lbs OC/day;

Applicable Compliance Method:

The recordkeeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

- 1.c** Emission Limitation:
Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance pursuant to the methods specified in OAC rule 3745-17-03 (B)(1).

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of the inks and clean up materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch 360 degree printer (#16-Bottom) with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R031 & R032 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by the emissions units 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: MIBK*

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 16

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9,444

MAGLC (ug/m3): 20,500

* The following additional conservative assumptions were made in the Screen modeling:

For emission units R031 & R032, all emissions of toxic compounds in the coatings were assumed to be MIBK which has the lowest TLV of the remaining toxic compounds.

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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

- 1.a** changes in the composition of the materials used (typically for coatings or 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;
- 1.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
- 1.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 Toxic 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the "Air Toxic 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 Toxic 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 Toxic 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: Printer #1 - Top (R033)

Activity Description: 10 inch 360 degree Printer Associated with Ink Mixing - Top

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch 360 degree printer (#1-Top) with dry filtration	OAC rule 3745-31-05 (A)(3) (PTI #03-11354)	7.60 tons organic compounds (OC)/yr (includes cleanup)
	OAC rule 3745 21-07 (G)(2)	See A.I.2.a. 8.0 lbs OC/hr 40.0 lbs OC/day
	OAC rule 3745-17-11 (A)	See A.I.2.b. None (See A.I.2.c)
	OAC rule 3745-17-07 (A)	None (See A.I.2.d.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
- 2.b The hourly and daily emission limitations for organic compounds apply only to the inks used in this emissions unit. The annual limitation includes emissions from both inks and cleanup materials.
- 2.c The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.d This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01 (C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - 1.a the company identification for each ink employed;

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

- 1.b the number of gallons of each ink employed;
- 1.c the organic compound content of each ink in pounds per gallon;
- 1.d the organic compound emission rate for each ink, in pounds per day (b X c);
- 1.e the total organic compound emission rate for all inks, in pounds per day (sum of d);
- 1.f the total number of hours the emissions unit was in operation; and
- 1.g the average hourly organic compound emission rate for all inks and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

- 2. The permittee shall collect and record the following information, each month, in conjunction with the above recordkeeping for the purpose of determining annual organic compound emissions:
 - 2.a the company identification for each cleanup material employed;
 - 2.b the number of gallons of each cleanup material employed;
 - 2.c the organic compound content of each cleanup material, in pounds per gallon;
 - 2.d the organic compound emission rate for each cleanup material, in pounds per month (b xc);
 - 2.e the total organic compound emission rate for all cleanup materials employed, (sum of d);
 - 2.f the total combined organic compound emission rate for all inks and cleanup materials, in pounds per month (sum of 1.d. above for all days in the month and 2.e.); and
 - 2.g the cumulative annual organic compound emissions from all coatings and cleanup materials for all calendar months in the year (sum of f).
- 3. The permittee shall maintain monthly records of the following information for this emissions unit:
 - 3.a the company identification of each cleanup material employed in this emissions unit; and
 - 3.b documentation on whether or not each cleanup material employed is a photochemically reactive material.

IV. Reporting Requirements

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

IV. Reporting Requirements (continued)

3. The permittee shall submit deviation quarterly (excursion) reports, in accordance with the General Terms and Conditions of this permit, paragraph A.I.c.ii, which identifies each day during which a photochemically reactive cleanup material was employed.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
8.0 lbs OC/hr and 40.0 lbs OC/day

Applicable Compliance Method:

The recordkeeping requirements in Section A.III.1. of this permit shall be used to determine compliance with the above limit.

- 1.b Emission Limitation:
7.6 tons OC/year

Applicable Compliance Method:

The recordkeeping requirements in Section A.III.2. of this permit shall be used to determine compliance with the above limit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the inks and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch 360 degree printer #1 Top	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R033 & R034 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units 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: cyclohexanone*

TLV (mg/m3): 100

Maximum Hourly Emission Rate (lbs/hr): 1.92

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 21.08

MAGLC (ug/m3): 2380.95

* The following additional conservative assumptions were made in the Screen modeling:

For emission unit R033 & R034, all emissions of toxic compounds in the coatings were assumed to be cyclohexanone which has the lowest TLV of the remaining toxic compounds.

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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

- 1.a** changes in the composition of the materials used (typically for coatings or 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;
- 1.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
- 1.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 Toxic 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.

- 2.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic 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 Toxic 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 Toxic 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: Printer #1 - Bottom (R034)

Activity Description: 10 inch 360 degree Printer Associated with Ink Mixing - Bottom

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch 369 degree printer #1 bottom, with dry filtration	OAC rule 3745-31-05 (A)(3) (PTI #03-11354)	7.60 tons organic compounds (OC)/yr (includes cleanup)
		See A.I.2.a.
	OAC rule 3745 21-07 (G)(2)	8.0 lbs OC/hr 40.0 lbs OC/day
		See A.I.2.b.
	OAC rule 3745-17-11 (A)	None (See A.I.2.c)
	OAC rule 3745-17-07 (A)	None (See A.I.2.d.)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
- 2.b The hourly and daily emission limitations for organic compounds apply only to the inks used in this emissions unit. The annual limitation includes emissions from both inks and cleanup materials.
- 2.c The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.d This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01 (C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - 1.a the company identification for each ink employed;

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

- 1.b the number of gallons of each ink employed;
- 1.c the organic compound content of each ink in pounds per gallon;
- 1.d the organic compound emission rate for each ink, in pounds per day (b X c);
- 1.e the total organic compound emission rate for all inks, in pounds per day (sum of d);
- 1.f the total number of hours the emissions unit was in operation; and
- 1.g the average hourly organic compound emission rate for all inks and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

- 2. The permittee shall collect and record the following information, each month, in conjunction with the above recordkeeping for the purpose of determining annual organic compound emissions:
 - 2.a the company identification for each cleanup material employed;
 - 2.b the number of gallons of each cleanup material employed;
 - 2.c the organic compound content of each cleanup material, in pounds per gallon;
 - 2.d the organic compound emission rate for each cleanup material, in pounds per month (b xc);
 - 2.e the total organic compound emission rate for all cleanup materials employed, (sum of d);
 - 2.f the total combined organic compound emission rate for all inks and cleanup materials, in pounds per month (sum of 1.d. above for all days in the month and 2.e.); and
 - 2.g the cumulative annual organic compound emissions from all coatings and cleanup materials for all calendar months in the year (sum of f).
- 3. The permittee shall maintain monthly records of the following information for this emissions unit:
 - 3.a the company identification of each cleanup material employed in this emissions unit; and
 - 3.b documentation on whether or not each cleanup material employed is a photochemically reactive material.

IV. Reporting Requirements

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

IV. Reporting Requirements (continued)

3. The permittee shall submit deviation quarterly (excursion) reports, in accordance with the General Terms and Conditions of this permit, paragraph A.I.c.ii, which identifies each day during which a photochemically reactive cleanup material was employed.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. shall be determined in accordance with the following methods:

- 1.a Emission Limitation:
8.0 lbs OC/hr and 40.0 lbs OC/day

Applicable Compliance Method:

The recordkeeping requirements in Section A.III.1. of this permit shall be used to determine compliance with the above limit.

- 1.b Emission Limitation:
7.6 tons OC/year

Applicable Compliance Method:

The recordkeeping requirements in Section A.III.2. of this permit shall be used to determine compliance with the above limit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the inks and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch 369 degree printer #1 bottom, with dry filtration	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R033 & R034 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units 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: cyclohexanone*

TLV (mg/m3): 100

Maximum Hourly Emission Rate (lbs/hr): 1.92

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 21.08

MAGLC (ug/m3): 2380.95

* The following additional conservative assumptions were made in the Screen modeling:

For emission unit R033 & R034, all emissions of toxic compounds in the coatings were assumed to be cyclohexanone which has the lowest TLV of the remaining toxic compounds.

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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

- 1.a** changes in the composition of the materials used (typically for coatings or 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;
- 1.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
- 1.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 Toxic 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.

- 2.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic 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 Toxic 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 Toxic 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: 10-inch Lacquer Line #1 (R035)
Activity Description: 10 inch Lacquer Line #1 Coats from Printer #3

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch lacquer line #1, with dry filtration	OAC rule 3745-31-05 (A)(3) (PTI #03-13587)	Coating Operations: 11.61 lbs organic compounds (OC)/hr 30.00 tons OC/yr
		Cleanup Operations: 210.75 lbs OC/month 1.26 tons OC/yr
		See A.I.2.c.
	OAC rule 3745-21-07 (G)(2)	See A.II.1.
	OAC rule 3745-17-11 (A)	None (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	None (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c The 11.61 lbs OC/hr emission limitation from the coating operation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for coating material usage:
 - a. the company identification for each coating material employed;
 - b. documentation of whether or not each coating employed is a photochemically reactive material;
 - c. the number of gallons of each coating material employed;
 - d. the organic compound content, in pounds per gallon, for each coating employed;
 - e. the organic compound emission rate for each coating employed, in lbs/month (c x d);
 - f. the total organic compound emission rate for all coating materials employed (sum of e); and
 - g. the annual, year to date organic compound emissions from all coating employed (sum of f for each calendar month to date from January to December).
2. The permittee shall collect and record the following information each month for cleanup material usage:
 - a. the company identification of each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the organic compound content, in pounds per gallon, for each cleanup material employed;
 - e. the organic compound emission rate for each cleanup material employed, in lbs/month (c x d);

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

- f. the total organic compound emission rate for all cleanup materials employed (sum of e); and
- g. The annual, year to date organic compound emissions from all cleanup materials employed (sum of f for each calendar month to date from January to December).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13587, issued on 3/13/01: A.IV.2. thru A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for both coating and cleanup operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

IV. Reporting Requirements (continued)

3. 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 a photochemically reactive coating or cleanup material. 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.
4. The permittee shall submit quarterly deviation (excursions) reports that identify all exceedances of the monthly OC emission limitation of 210.75 pounds (from cleanup materials). These quarterly reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
11.61 lbs OC/hr from coating operations

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit determined by multiplying the maximum coating usage rate (1.7 gallons/hr) by the maximum OC content (6.83 lbs OC/gallon of coating), as applied. If required the permittee shall demonstrate compliance through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18 or 25, as appropriate.

- 1.b Emission Limitation:
30.00 tons OC/yr from coating operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.1.

- 1.c Emission Limitation:
210.75 lbs OC/month from cleanup operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

- 1.d Emission Limitation:
1.26 tons OC/year from cleanup operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch lacquer line #1, with dry filtration	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R035 & R036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units 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: n-butyl acetate*

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 11.61

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2427

MAGLC (ug/m3):16976

* The following additional conservative assumptions were made in the Screen modeling:

For emission unit R035 & R036, all emissions of toxic compounds in the coatings or were assumed to be n-butyl acetate which has the lowest TLV of the remaining toxic compounds.

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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

- 1.a** changes in the composition of the materials used (typically for coatings or 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;
- 1.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
- 1.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 Toxic 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.

- 2.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic 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 Toxic 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 Toxic 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: 10-inch Lacquer Line #2 (R036)
Activity Description: 10 inch Lacquer Line #2 Coats from Printer #1

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch lacquer line #2, with dry filtration	OAC rule 3745-31-05 (A)(3) (PTI #03-13587)	Coating Operations: 11.61 lbs organic compounds (OC)/hr 30.00 tons OC/yr
		Cleanup Operations: 210.75 lbs OC/month 1.26 tons OC/yr
		See A.I.2.c.
	OAC rule 3745-21-07 (G)(2)	See A.II.1.
	OAC rule 3745-17-11 (A)	None (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	None (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c The 11.61 lbs OC/hr emission limitation from the coating operation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for coating material usage:
 - a. the company identification for each coating material employed;
 - b. documentation of whether or not each coating employed is a photochemically reactive material;
 - c. the number of gallons of each coating material employed;
 - d. the organic compound content, in pounds per gallon, for each coating employed;
 - e. the organic compound emission rate for each coating employed, in lbs/month (c x d);
 - f. the total organic compound emission rate for all coating materials employed (sum of e); and
 - g. the annual, year to date organic compound emissions from all coating employed (sum of f for each calendar month to date from January to December).
2. The permittee shall collect and record the following information each month for cleanup material usage:
 - a. the company identification of each cleanup material employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the organic compound content, in pounds per gallon, for each cleanup material employed;
 - e. the organic compound emission rate for each cleanup material employed, in lbs/month (c x d);

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

- f. the total organic compound emission rate for all cleanup materials employed (sum of e); and
- g. The annual, year to date organic compound emissions from all cleanup materials employed (sum of f for each calendar month to date from January to December).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13587, issued on 3/13/01: A.IV.2. thru A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for both coating and cleanup operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

IV. Reporting Requirements (continued)

3. 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 a photochemically reactive coating or cleanup material. 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.
4. The permittee shall submit quarterly deviation (excursions) reports that identify all exceedances of the monthly OC emission limitation of 210.75 pounds (from cleanup materials). These quarterly reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
11.61 lbs OC/hr from coating operations

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit determined by multiplying the maximum coating usage rate (1.7 gallons/hr) by the maximum OC content (6.83 lbs OC/gallon of coating), as applied. If required the permittee shall demonstrate compliance through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18 or 25, as appropriate.

- 1.b Emission Limitation:
30.00 tons OC/yr from coating operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.1.

- 1.c Emission Limitation:
210.75 lbs OC/month from cleanup operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

- 1.d Emission Limitation:
1.26 tons OC/year from cleanup operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 inch lacquer line #2, with dry filtration	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions units R035 & R036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units 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: n-butyl acetate*

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 11.61

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2427

MAGLC (ug/m3):16976

* The following additional conservative assumptions were made in the Screen modeling:

For emission unit R035 & R036, all emissions of toxic compounds in the coatings or were assumed to be n-butyl acetate which has the lowest TLV of the remaining toxic compounds.

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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

- 1.a** changes in the composition of the materials used (typically for coatings or 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;
- 1.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
- 1.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 Toxic 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.

- 2.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic 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 Toxic 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 Toxic 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: 4-inch Lacquer Line (R038)
Activity Description: 4 inch Lacquer Line Coats from Printer #2

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4 inch lacquer line, with dry filtration	OAC rule 3745-31-05 (A)(3) (PTI #03-13650)	3.69 lbs organic compounds (OC)/hr 13.28 tons/yr from coating operations
		140.5 lbs OC/month 0.85 ton OC/yr from cleanup operations
		See A.I.2.c.
	OAC rule 3745-21-07 (G)(2)	See A.II.1.
	OAC rule 3745-17-11 (A)	None (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	None (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A) (2) (ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B) (2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A) (3) (h) because OAC rule 3745-17-11 is not applicable.
- 2.c The 3.69 lbs OC/hr emission limitation from the coating operation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall not employ any coating or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for coating material usage:
 - a. the company identification for each coating material employed;
 - b. documentation of whether or not each coating employed is a photochemically reactive material;
 - c. the number of gallons of each coating material employed;
 - d. the organic compound content, in pounds per gallon' for each coating employed;
 - e. the organic compound emission rate for each coating employed, in lbs/month (c x d);
 - f. the total organic compound emission rate for all coating materials employed (sum of e); and
 - g. the annual, year to date organic compound emissions from all coating employed (sum of f for each calendar month to date from January to December).
2. The permittee shall collect and record the following information each month for cleanup material usage:
 - a. the company identification of each cleanup material employed,
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material,
 - c. the number of gallons of each cleanup material employed,
 - d. the organic compound content, in pounds per gallon, for each cleanup material employed,
 - e. the organic compound emission rate for each cleanup material employed, in lbs/month (c x d),

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

- f. the total organic compound emission rate for all cleanup materials employed (sum of e), and
- g. The annual, year to date organic compound emissions from all cleanup materials employed (sum of f for each calendar month to date from January to December).

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13650, issued on 12/6/01: A.IV.2.thru A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for both coating and cleanup operations for the previous calendar year. These reports shall be submitted by January 31 of each year.

IV. Reporting Requirements (continued)

3. 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 any photochemically reactive coating or cleanup material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursions) reports that identify all exceedances of the monthly OC emission limitation of 140.5 pounds (from cleanup materials). These quarterly reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
3.69 lbs OC/hr from coating operations

Applicable Compliance Method:

The hourly emission limitation represents the emissions unit's potential to emit determined by multiplying the maximum coating usage rate (0.54 gallons/hr) by the maximum OC content (6.83 lbs OC/gallon of coating), as applied. If required the permittee shall demonstrate compliance through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18 or 25, as appropriate.

- 1.b Emission Limitation:
13.28 tons OC/yr from coating operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.1.

- 1.c Emission Limitation:
140.5 lbs OC/month from cleanup operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

- 1.d Emission Limitation:
0.85 ton OC/year from cleanup operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4 inch lacquer line with dry filtration	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R037 & R038 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units 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: cyclohexanone

TLV (mg/m³):100

Maximum Hourly Emission Rate (lbs/hr): 0.61

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2304.6

MAGLC (ug/m³): 2381

Pollutant: Ethyl Acetate

TLV (mg/m³):1440

Maximum Hourly Emission Rate (lbs/hr):0.62

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2342.4

MAGLC (ug/m³): 34,286

Pollutant: n-butyl acetate

TLV (mg/m³): 700

Maximum Hourly Emission Rate (lbs/hr): 2.63

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 9936

MAGLC (ug/m³): 16,667

Pollutant: propylene glycol monomethyl ether acetate

TLV (mg/m³): 369

Maximum Hourly Emission Rate (lbs/hr): 1.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4835.8

MAGLC (ug/m³): 8786

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

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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or 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 Toxic 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic 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 Toxic 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 Toxic 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: 6-inch Lacquer Line (R039)

Activity Description: 6-inch Lacquer Line

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6 inch play ball lacquer line, with dry filtration	OAC rule 3745-31-05 (A)(3)	4.64 lbs organic compounds (OC)/hr 20.32 tons/yr from coating operations
	PTI 03-13761	140.5 lbs OC/month 0.85 ton OC/yr from clean up operations
	OAC rule 3745-21-07 (G)(2)	See A.II.1.
	OAC rule 3745-17-11 (A)	See A.I.2.a.
	OAC rule 3745-17-07 (A)	See A.I.2.b.

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c The 4.64 lbs OC/hr emission limitation from the coating operation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for coating material usage in emissions unit R039:
 - 1.a the company identification for each coating material employed;
 - 1.b documentation of whether or not each coating employed is a photochemically reactive material;

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

- 1.c** the number of gallons of each coating material employed;
- 1.d** the organic compound content, in pounds per gallon, for each coating employed;
- 1.e** the organic compound emission rate for each coating employed; in lbs/month (c X d)
- 1.f** the total organic compound emission rate for all coating materials employed [sum of (e)];
- 1.g** the annual, year to date organic compound emissions from all coating employed (sum of f) for each calendar month to date from January to December).
- 2.** The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R039:
 - 2.a** the company identification of each cleanup material employed;
 - 2.b** documentation on whether or not each cleanup material employed is a photochemically reactive material;
 - 2.c** the number of gallons of each cleanup material employed;
 - 2.d** the organic compound content, in pounds per gallon, for each cleanup material employed;
 - 2.e** the organic compound emission rate for each cleanup material employed, in lbs/month (c X d);

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

OC emissions from cleanup operations= (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density);

- 2.f** the total organic compound emission rate for all cleanup materials employed [sum of e]; and
- 2.g** the annual, year to date organic compound emissions from all cleanup materials employed (sum of f for each calendar month to date from January to December).

IV. Reporting Requirements

- 1.** The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for both coating and cleanup operations for the previous calendar year. These reports shall be submitted by January 31 of each year.
- 2.** 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 any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- 3.** The permittee shall submit quarterly deviation (excursions) reports that identify all exceedances of the monthly OC emission limitation of 140.5 pounds (from cleanup materials). These quarterly reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

- 1.** Compliance with the emissions limitations in section A.I.1. of this permit to install shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
4.64 lbs OC/hr from coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission units potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

* The potential to emit for this emissions unit was based on a maximum OC content of 6.83 pounds per gallon and a maximum hourly usage rate of 0.68 gallons per hour.

- 1.b** Emission Limitation:
20.32 tons OC/yr from coating operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.1.

- 1.c** Emission Limitation:
140.5 lbs OC/month from cleanup operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

- 1.d** Emission Limitation:
0.85 ton OC/year from cleanup operations

Applicable Compliance Method:

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6 inch play ball lacquer line, with dry filtration	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for emissions unit R039 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the permit to install application and the SCEEN 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: cyclohexanone*

TLV (mg/m3): 100

Maximum Hourly Emission Rate (lbs/hr): 4.64

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 978.6

MAGLC (ug/m3): 2381

* assume that all of the emissions are cyclohexanone, which is the air toxic with the lowest TLV

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

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 Toxic 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 Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or 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 Toxic 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic 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 Toxic 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 Toxic 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: 9.5" Tampo Printer #1 (R040)
Activity Description: Formerly Z005 (Renamed R040)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
9.5 inch Tampo Printer #1	OAC rule 3745-17-11 (A)	None (see A.1.2.a.)
	OAC rule 3745-17-07 (A)	None (see A.1.2.b.)
	OAC rule 3745-27-07 (G)(2)	None (see A.1.2.c.)

2. Additional Terms and Conditions

- 2.a** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 (B)(2) does not apply. Also, Table I does not apply because the facility is located in Ashland County.
- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c** OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: 9.5" Tampo Printer #2 (R041)
Activity Description: Tampo Ink Printer #2 (formerly Z006)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
9.5 inch Tampo Printer #2	OAC rule 3745-17-11 (A)	None (see A.1.2.a.)
	OAC rule 3745-17-07 (A)	None (see A.1.2.b)
	OAC rule 3745-21-07 (G)(2)	None (see A.1.2.c.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 (B)(2) does not apply. Also, Table I does not apply because the facility is located in Ashland County.
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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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: 9.5" Tampo Printer #3 (R042)
Activity Description: 9.5-inch Tampo Ink Printer #3 (formerly Z007)

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
9.5 inch Tampo printer #3	OAC rule 3745-17-11 (A)	None (see A.1.2.a)
	OAC rule 3745-17-07 (A)	None (see A.1.2.b)
	OAC rule 3745-21-07 (G)(2)	8.0 lbs organic compounds (OC)/hr 40 lbs OC/day

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - 1.a the company identification for each ink and photochemically reactive cleanup material employed;
 - 1.b the number of gallons of each ink and photochemically reactive cleanup material employed;
 - 1.c the OC content of each ink and photochemically reactive cleanup material, in pounds per gallon;
 - 1.d the total OC emission rate for all inks and photochemically reactive cleanup materials, in pounds per day;
 - 1.e the total number of hours the emissions unit was in operation; and

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

- 1.f** the average hourly OC emission rate for all inks and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hours (average).

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

IV. Reporting Requirements

- 1.** The permittee shall submit quarterly deviation (excursion) reports which identify the following information:
- 1.a** An identification of each day during which the average hourly organic compound emissions from the inks and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
- 1.b** An identification of each day during which the organic compound emissions from the inks and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit, paragraph A.1.c.ii.

V. Testing Requirements

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

- 1.a** Emission Limitation:
8 lbs OC/hr, 40 lbs OC/day

Applicable Compliance Method:

The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limit.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC content of the inks.

VI. Miscellaneous Requirements

- 1.** The permittee installed this emissions unit in January of 1979 without first applying for and obtaining a Permit to Install (PTI), in violation of OAC rule 3745-31-02. Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install application within 2 months following the issuance of this permit.

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.

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