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

10/02/03

RE: Proposed Title V Chapter 3745-77 Permit
03-03-01-0045
Hedstrom Corporation

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Hedstrom Corporation, has been created in Ohio EPA's State Air Resources System (STARS) on 10/02/03, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact me at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

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

cc: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 10/02/03	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

P021 (Powder Blending)
Powder Blending Mixers with Baghouse

R005 (6-inch, 360 Tampo Printer)
6-inch, 360 degree Tampo Printer (previously vinyl Tampo printer # 1)

R006 (Hand Splatter Booth)
Hand Splatter Spray Booth (previously spray booths ID#s 25006 & 25007; 25007 was removed in 1981)

R007 (Semi-Automatic Decorator #1)
Not Currently Operational. Semi-Automatic Decorator Spray Booth (previously spray booth ID# 25013)

R008 (Semi-Automatic Decorator #2)
Not Currently Operational. Semi-Automatic Decorator Spray Booth (previously spray booth ID# 20105)

R009 (Maintenance Decorator)
Maintenance Samples Decorator Spray Booth. (previously spray booth ID# 20066)

R031 (Printer #3 - Top)
10 inch 360 degree Printer -Top

R032 (Printer #3 - Bottom)
10-inch, 360 degree Printer - Bottom

R033 (Printer #1 - Top)
10-inch, 360 degree Printer -Top

R034 (Printer #1 - Bottom)
10-inch, 360 degree Printer - Bottom

R035 (10-inch Lacquer Line #1)
10-inch Lacquer Line #1 Coats from Printer #3

R036 (10-inch Lacquer Line #2)
10-inch Lacquer Line #2 Coats from Printer #1

R038 (4-inch Lacquer Line)
4-inch Lacquer Line Coats from Printer #2

R039 (6-inch Lacquer Line)
6-inch Lacquer Line

R040 (9.5" Tampo Printer #1)
9.5-inch Lamps Printer (formerly Z005)

R041 (9.5" Tampo Printer #2)
9.5-inch Tampo Printer (formerly Z006)

R042 (9.5" Tampo Printer #3)
9.5-inch Tampo Printer (formerly Z007)

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, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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

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

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

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

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

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

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

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

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

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

These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

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

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

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

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be

submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months.

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

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

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

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

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

2. Scheduled Maintenance

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

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

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

4. Title IV Provisions

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

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

5. Severability Clause

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

6. General Requirements

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

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

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

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

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

(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. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

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

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

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

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

17. Compliance Method Requirements

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

18. Insignificant Activities

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))

21. Permanent Shutdown of an Emissions Unit

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

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

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

R037 4-inch, 360-degree Printer #2 [PTI no. 03-13650]
T005 #2 Fuel Oil Storage Tank (Tank 5) [PTI no. 03-2837]
T006 #2 Fuel Oil Storage Tank (Tank 6) [PTI no. 03-2837]

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

B. State Only Enforceable Section

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

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
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)
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)

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.

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

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. the total duration of any visible emission incident; and
c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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 may demonstrate compliance with the hourly allowable PE 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 minutes/hr and dividing by 7000 gr/lb.

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

1.b Emission Limitation:
1.71 tons PE/yr

Applicable Compliance Method:
The permittee may demonstrate compliance with the annual allowable PE limitation by multiplying the hourly allowable PE limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

1.c Emission Limitation:
0.01 gr PE/dscf

Applicable Compliance Method:
If required, compliance with PE limitation above 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 the VE limitation above 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.

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 6-inch, 360 Tampo Printer (R005)

Activity Description: 6-inch, 360 degree Tampo Printer (previously vinyl Tampo 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
6-inch, 360-degree printer, equipped with dry filtration (this emissions unit will be re-designated as R027 when a revised Title V permit application is submitted)	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.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)(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 hour (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 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 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 Conditons 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 Limitations:
8 lbs OC/hr, 40 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations above based on the record keeping requirements established in Section A.III.1 of this permit .

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

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Hand Splatter Booth (R006)

Activity Description: Hand Splatter Spray Booth (previously spray booths ID#s 25006 & 25007; 25007 was removed in 1981)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
hand splatter decorator spray booth, equipped 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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Semi-Automatic Decorator #1 (R007)

Activity Description: Not Currently Operational. Semi-Automatic Decorator Spray Booth (previously spray booth ID# 25013)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
semi-automatic decorator #1, equipped 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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Semi-Automatic Decorator #2 (R008)

Activity Description: Not Currently Operational. Semi-Automatic Decorator Spray Booth (previously spray booth ID# 20105)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
semi-automatic decorator #2, equipped 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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Maintenance Decorator (R009)

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Printer #3 - Top (R031)

Activity Description: 10 inch 360 degree Printer -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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch, 360-degree printer (#3-Top), equipped 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 (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 photochemically reactive 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 photochemically reactive cleanup material employed;

1.b the number of gallons of each ink and photochemically reactive cleanup material employed;

1.c the organic compound content of each ink and photochemically reactive 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 photochemically reactive cleanup material, in pounds per day (b X c);

1.e the total organic compound emission rate for all inks and photochemically reactive 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 photochemically reactive 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.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

1.a 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 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 Conditons 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.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of this permit 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 may demonstrate compliance with the hourly allowable PE limitation by employing the following equation:

E = particulate emission rate (lbs/hr)

E = maximum coating solids usage (lbs/hr) x (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 hourly allowable PE limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

1.b Emission Limitations:
8.0 lbs OC/hr, 40.0 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations above based on the record keeping requirements established in Section A.III.1 of this permit.

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

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 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch, 360-degree printer (#3-Top), equipped 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 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 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 - 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch, 360-degree printer (#3-Bottom), equipped 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 (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 photochemically reactive 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 photochemically reactive cleanup material employed;

1.b the number of gallons of each ink and photochemically reactive cleanup material employed;

1.c the organic compound content of each ink and photochemically reactive 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 photochemically reactive cleanup material, in pounds per day (b X c);

1.e the total organic compound emission rate for all inks and photochemically reactive 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 photochemically reactive 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.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

1.a 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 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 Conditons 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.

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of this permit 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 may demonstrate compliance with the hourly allowable PE limitation by employing the following equation:

E = particulate emission rate (lbs/hr)

E = maximum coating solids usage (lbs/hr) x (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 hourly allowable PE limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

1.b Emission Limitations:
8.0 lbs OC/hr, 40.0 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations above based on the record keeping requirements established in Section A.III.1 of this permit.

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

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 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch, 360-degree printer (#3-Bottom), equipped 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 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 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 -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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch, 360-degree printer #1 Top	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 the inks, in pounds per day (sum of d for all inks);

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 the inks, 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.]

2. The permittee shall collect and record the following information, each month, in conjunction with the above record keeping for the purpose of determining annual OC 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 OC content of each cleanup material employed, in pounds per gallon;

2.d the OC emission rate for each cleanup material employed, in pounds (b xc);

2.e the total OC emission rate for all the cleanup materials employed (summation of d for all cleanup materials), in tons;

2.f the total OC emission rate for all the inks and cleanup materials employed, in pounds (summation of A.III.1.e above for all days in the month + A.III.2.e); and

2.g the cumulative annual OC emissions for all the inks 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 quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify the following information:

a. Each day during which the average hourly organic compound emissions from the inks exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. Each day during which the organic compound emissions from the inks exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit annual reports that specify the total OC emissions (for all the inks and cleanup materials) for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, paragraph A.I.c.ii, that identify 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 Limitations:
8.0 lbs OC/hr, 40.0 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations above based on the record keeping requirements established in Section A.III.1 of this permit.

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

1.b Emission Limitation:
7.6 tons OC/year

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable OC emission limitation above based on the record keeping requirements established in Section A.III of this permit.

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

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

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

1. 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 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 - 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch, 360-degree printer #1 bottom, equipped 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 the inks, in pounds per day (sum of d for all inks);

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 the inks, 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.]

2. The permittee shall collect and record the following information, each month, in conjunction with the above record keeping for the purpose of determining annual OC 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 OC content of each cleanup material employed, in pounds per gallon;

2.d the OC emission rate for each cleanup material employed, in pounds (b xc);

2.e the total OC emission rate for all the cleanup materials employed (summation of d for all cleanup materials), in tons;

2.f the total OC emission rate for all the inks and cleanup materials employed, in pounds (summation of A.III.1.e above for all days in the month + A.III.2.e); and

2.g the cumulative annual OC emissions for all the inks 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 quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify the following information:

a. Each day during which the average hourly organic compound emissions from the inks exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

b. Each day during which the organic compound emissions from the inks exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit annual reports that specify the total OC emissions (for all the inks and cleanup materials) for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, paragraph A.I.c.ii, that identify 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 Limitations:
8.0 lbs OC/hr, 40.0 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations above based on the record keeping requirements established in Section A.III.1 of this permit.

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

1.b Emission Limitation:
7.6 tons OC/year

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable OC emission limitation above based on the record keeping requirements established in Section A.III of this permit.

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

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch, 360-degree printer #1 bottom, equipped 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 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 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch lacquer line #1, equipped 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 The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). See A.I.2.c.
	OAC rule 3745-21-07 (G)	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 for 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 coatings 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 permittee may calculate the 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 record keeping requirements specified in section A.III.1 of this permit.

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

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping requirements specified in section A.III.2 of this permit.

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 of this permit.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch lacquer line #1, equipped 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 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 be still 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 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch lacquer line #2, equipped 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 The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). See A.I.2.c.
	OAC rule 3745-21-07 (G)	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 for 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 coatings 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 permittee may calculate the 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 record keeping requirements specified in section A.III.1 of this permit.

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

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping requirements specified in section A.III.2 of this permit.

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 of this permit.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10-inch lacquer line #2, equipped 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 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 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
4-inch lacquer line, equipped 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 The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). See A.I.2.c.
	OAC rule 3745-21-07 (G)	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 for 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 for all coatings); and

g. the annual, year-to-date organic compound emissions from all coatings 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 permittee 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 record keeping requirements specified in section A.III.1 of this permit.

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

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping requirements specified in section A.III.2 of this permit.

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

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping requirements specified in section A.III.2 of this permit.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
4-inch lacquer line, equipped 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 be still 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 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
6-inch play ball lacquer line, equipped with dry filtration	OAC rule 3745-31-05 (A)(3) (PTI #03-13761)	4.64 lbs organic compounds (OC)/hr 20.32 tons/yr from coating operations 140.5 lbs OC/month 0.85 ton OC/yr from cleanup operations The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G). See A.I.2.c.
	OAC rule 3745-21-07 (G)	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 4.64 lbs OC/hr emission limitation for 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 for all coatings); and

g. the annual, year-to-date organic compound emissions from all coatings 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 permittee 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. 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 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.

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:

1.a Emission Limitation:
4.64 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 (0.68 gallon/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:
20.32 tons OC/yr from coating operations

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

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

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping requirements specified in section A.III.2 of this permit.

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

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping requirements specified in section A.III.2 of this permit.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
6-inch play ball lacquer line, equipped 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 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 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): 4.64

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

MAGLC (ug/m3): 2381

* the following additional conservative assumptions were made in the screen modeling:

for emissions unit R039, all emissions of toxic compounds in the coatings were assumed to be cyclohexane which has the lowest TLV of the remaining toxic compounds.

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 be still 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 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: 9.5-inch Lamps Printer (formerly Z005)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
9.5-inch Tampo Printer #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.)
	OAC rule 3745-21-07 (G)(2)	none (See A.I.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.

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 9.5" Tampo Printer #2 (R041)

Activity Description: 9.5-inch Tampo Printer (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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
9.5-inch Tampo Printer #2	OAC rule 3745-17-11 (A)	none (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	none (See A.I.2.b.)
	OAC rule 3745-21-07 (G)(2)	none (See A.I.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.

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 9.5" Tampo Printer #3 (R042)

Activity Description: 9.5-inch Tampo Printer (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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
9.5-inch Tampo printer #3	OAC rule 3745-17-11 (A)	none (See A.I.2.a.)
	OAC rule 3745-17-07 (A)	none (See A.I.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 hour (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 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 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 Conditons 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 Limitations:
8 lbs OC/hr, 40 lbs OC/day

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly and daily allowable OC emission limitations above based on the record keeping requirements established in Section A.III.1 of this permit.

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

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

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 (completed; the PTI application for this emissions unit was included in the synthetic minor PTI application submitted to the Ohio EPA, NWDO on September 3, 2003).

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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