OhioEPA

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

04/11/01

CERTIFIED MAIL

RE: Preliminary Proposed Title V
Chapter 3745-77 permit

02-43-00-1188
Marking Films Div. of Avery Dennison Building #11
Louise Watson
670 Hardy Road
Building #11
Painesville, OH 44077-4573

Dear Louise Watson:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 06/30/99. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

and

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

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

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

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northeast District Office
Becky Castle, DAPC PMU

Ohio EPA
State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Date: 04/11/01
Effective Date: **To be entered upon final issuance**
Expiration Date: **To be entered upon final issuance**

This document constitutes issuance to:

Marking Films Div. of Avery Dennison Building #11
670 Hardy Road
Building #11
Painsville, OH 21663-9378

of a Title V permit for Facility ID: 02-43-00-1188

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
K001 (F-1 Coater)
F-1 Coater - Custom Coating Line (K001)

K002 (F-2 Coater)
F-2 Coater - Adhesive Coating Line (K002) & F-2 Corona Treater (OEPA Source #P004)

K003 (F-3 Coater)
F-3 Coater - Adhesive Coating Line (K003) & F-3 Corona Treater

P001 (Churn Cleaner)
670-1 Churn Washer/Solvent Reclaim Unit

P006 (Mixer)
670-5 50-HP Compounding Mixer

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.

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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i)

and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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 are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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.

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.

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. 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.

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.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency 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.

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.

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).

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.

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

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

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

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

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

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

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.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) 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. 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.)

3. 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.

4. 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.

5. 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).

6. 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.

7. 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.

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

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

P003-670-1 Versator Cleaning
P005-670-1 25-HP Compounding Mixer
P007-670-3 10-HP Compounding Mixer
Z001-670-1B Solvent Wash Tank (F-1)(One of six wash tanks included in OEPA Permit ID:L001)
Z002-670-1A Solvent Wash Tank (F-1)(One of six wash tanks included in OEPA Permit ID:L001)
Z003-670-2B Solvent Wash Tank (F-2)(One of six wash tanks included in OEPA Permit ID:L001)
Z004-670-4 Solvent Wash Tank (Cmp. Rm.)(One of six wash tanks included in OEPA Permit ID:L001)
Z005-670-3 Solvent Wash Tank (Adh. Rm.)(One of six wash tanks included in OEPA Permit ID:L001)
Z006-670-2A Solvent Wash Tank (F-2)(One of six wash tanks included in OEPA Permit ID:L001)
Z007-670-5 Solvent Wash Tank
Z008-670-6 Solvent Wash Tank
Z009-670-7 Solvent Wash Tank
Z010-670-8 Solvent Wash Tank
Z012-670-2 25HP Adhesive
Z013-670-1 10-HP Adhesive Mixer(One of two mixers included in OEPA Permit ID: P002)
Z014-670-1 Vorta Siv
Z015-670-1 Welding Station
Z016-Water based wash tank (F-3 Coater) Adhesive delivery system
Z017-Solvent Wash Tank (F-3 Coater) Adhesive delivery system
Z018-Five (5) 1-HP Bench top mixers (Color Lab)

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: F-1 Coater (K001)

Activity Description: F-1 Coater - Custom Coating Line (K001)

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
F-1 adhesive coating line with thermal oxidizer #1; EPA unit number K001 (Building #11)	OAC rule 3745-21-09(F)	The emission limitations specified by this rule are less stringent than the emissions limitations specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1) and the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR, Part 60, Subpart RR	The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05. 0.20 kg VOC/kg of coating solids applied for emulsion and water based coatings (See A.I.2.a.)
	OAC rule 3745-31-05 PTI # 02-3702 (synthetic minor)	39.36 tons VOC per year, on a rolling 365-day basis, from the coating line, including cleanup 90.16% overall VOC reduction by weight (92% capture and 98.0% destruction) for all solvent based coatings (See A.I.2.a.) For emulsion and water based coatings, the emission limitation established pursuant to this rule is less stringent than the emission limitation specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1).
	40 CFR Part 63, Subpart JJJJ	See Sections A.IV.6 and A.IV.7 of these terms and conditions.

2. Additional Terms and Conditions

2.a A solvent based coating is any coating that has a VOC content greater than 0.20 kg VOC per kg coating solids applied.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The thermal oxidizer control system shall be designed and operated according to good engineering practices and the manufacturer's specifications.

3. The permittee shall limit coating usage so that the amount of VOC applied is no more than 400 tons per rolling 365-day period according to synthetic minor PTI #02-3702 restrictions.

4. The emissions unit shall be vented to the thermal oxidizer during all solvent based coating operations and shall not vent through any bypass stack except when employing only emulsion or water based coatings.

5. The permittee shall properly maintain and operate the LEL units in the bypass stack, to ensure that emissions from solvent based coatings do not go directly to the ambient air. These records shall be made available to the Director or his representative upon request during normal business hours.

6. During the required use of the thermal oxidizer, the permittee shall ensure that any inline bypass that could divert solvent laden air from each coating applicator to the ambient air is closed.

In addition, any device in the bypass which indicates a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

7. The interior of the oven for this emissions unit shall be inspected weekly and if a build up of any material which would contribute to visible emissions has occurred, the zones shall be cleaned.

III. Monitoring and/or Record Keeping Requirements

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

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

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

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

c. A record of all periods of time during which solvent based coatings were employed, but the VOC emissions were not vented to the thermal oxidizer.

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

2. The permittee shall collect and record the following information daily for all coatings and associated cleanup materials, except emulsion and water based coatings:

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

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

c. The number of gallons of each coating employed, excluding water and exempt solvents.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total uncontrolled VOC emissions from all coatings and from all cleanup materials employed, in pounds or tons.

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

i. The total VOC emission rate, including controlled VOC emisssions from the coatings plus uncontrolled emissions from cleanup materials.

3. The permittee shall collect and record the following information daily for all emulsion and water based coatings employed in this emissions unit:

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

b. the VOC content of each coating, in kg/kg of coating solids, as applied, and in pounds per gallon, excluding water and exempt solvents.

4. The permittee shall collect and record the following information daily for all the emulsion and water based coatings and associated cleanup materials employed in this emissions unit:

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

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

c. The number of gallons of each coating employed, excluding water and exempt solvents.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total VOC emissions from all coatings employed and from all coatings and cleanup materials employed, in pounds or tons.

h. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

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

5. The permittee shall record the following information daily:

a. The total daily VOC emissions from this emissions unit, i.e., the sum of the values from A.III.2.i + A.III.4.g (for coatings and cleanup materials).

b. The rolling, 365-day summation of the total VOC emissions.

c. The total daily VOC usage rate (total uncontrolled VOC emissions) in this coating line, i.e., the sum of the values from A.III. 2.g (for coatings only) + A.III.4.g (for coatings only).

d. The rolling, 365-day summation of the total VOC usage rates.

6. The permittee shall maintain records of the maintenance and operation of the LEL units which ensure that emissions from solvent based coatings do not go directly to the ambient air, and these records shall be made available to the Director or his representative upon request during normal business hours.

7. The LEL in the bypass stack shall be monitored daily to ensure the use of the thermal oxidizer during solvent based coating.

8. The permittee shall maintain a calendar month record of all coatings used and the results of Method 24 or any alternative compliance test method approved by the Ohio EPA for determining the VOC content of each coating.

9. The permittee shall maintain records of all inspections of the interior of the oven and whether or not the inspection resulted in cleaning the zones.

10. Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

IV. Reporting Requirements

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

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

b. All periods when the stack that bypasses the thermal oxidizer was used while employing solvent based coatings in the emissions unit

2. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the VOC content of any emulsion or water based coating exceeded the applicable limitation of 0.20 kg of VOC per kg of coating solids, as applied.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 45 days after the exceedance(s) occurred.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC usage limitation of 400 tons and the rolling, 365-day VOC emission limit of 39.36 tons.

4. The permittee shall submit annual reports which specify the total VOC emissions and the total VOC usage for this emissions unit. These reports shall be submitted by January 31 of each year.

5. The permittee shall submit quarterly deviation (excursion) reports that identify all weeks when the interior of the oven was not inspected and/or the zones were not cleaned.

IV. Reporting Requirements (continued)

6. Within 120 days after promulgation of 40 CFR 63 Subpart JJJJ, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report:

a. the name and mailing address of the permittee;

b. the physical location of the source if it is different from the mailing address;

c. identification of the relevant MACT standards and the permittee's compliance date;

d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

7. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR 63 Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

a. the methods used to determine compliance;

b. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart JJJJ;

e. an analysis demonstrating whether the affected source is a major source or an area source;

f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

g. a statement of whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart JJJJ.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for all coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

V. Testing Requirements (continued)

2. Emission Limitation:

90.16% overall VOC reduction by weight (92% capture and 98% destruction) for all coatings except emulsion and water based coatings

Applicable Compliance Method:

Performance testing shall be conducted within 3 months after issuance of this permit and, and within 6 months prior to permit expiration using the following methods:

40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M, Method 204.

Performance testing shall be in accordance with OAC rule 3745-21-10(C).

3. Emission Limitation:

0.20 kilogram of VOC per kilogram of solids, as applied, when employing emulsion or water based coatings

Applicable Compliance Method:

Compliance shall be based upon the use of Method 24, or any alternative compliance method approved by the USEPA for determining the VOC content of each coating, and on the record keeping requirements in Section A.III.3 of these terms and conditions.

4. Emission Limitation:

39.36 tons per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements of Section A.III.2 and 4 of these terms and conditions.

5.a Emission testing requirements

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

i. The emission testing shall be conducted within 3 months after issuance of this permit, and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and destruction efficiency limitations for VOC of 92% and 98.0%, respectively.

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

Method 25 of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR, Part 60 Appendix A, if the VOC concentrations as carbon in the outlet are less than 50ppm; and

Method 204 of 40 CFR Part 51 Appendix M.

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

iv. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of the Ohio EPA.

V. Testing Requirements (continued)

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

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA and local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

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

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: F-2 Coater (K002)

Activity Description: F-2 Coater - Adhesive Coating Line (K002) & F-2 Corona Treater (OEPA Source #P004)

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
F-2 Faustel 60-inch adhesive coating line with thermal oxidizer #2 & F-2 corona treater; EPA unit number F002 (Building #11)	OAC rule 3745-21-09(F)	The emission limitations specified by this rule are less stringent than the emissions limitations specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1) and the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05 PTI # 02-7592	0.1 pound per hour and 0.44 ton per year ozone
	OAC rule 3745-31-05 PTI # 02-6981	8.90 pounds VOC per hour from the coating line, including cleanup, as a daily average 39.0 tons VOC per year from the coating line, including cleanup 98.0% overall VOC reduction by weight (100% capture and 98.0% destruction) for all solvent based coatings (See A.I.2.b.) For emulsion and water based coatings, the emission limitation established pursuant to this rule is less stringent than the emission limitation specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR, Part 60, Subpart RR	The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05. 0.20 kg VOC/kg of coating solids applied for emulsion and water based coatings
	40 CFR Part 63, Subpart JJJJ	See Sections A.IV.6 and A.IV.7 of these terms and conditions.

2. Additional Terms and Conditions

2.a The permittee shall install and maintain a permanent total enclosure, that complies with the requirements in 40 CFR 60, Reference Method 204, to capture all VOC emissions from this emissions unit.

2.b A solvent based coating is any coating that has a VOC content greater than 0.20 kg VOC per kg coating solids applied.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. This emissions unit shall be enclosed such that all VOC emissions are captured, contained and, when solvent based coatings are being employed, vented to the thermal oxidizer. Compliance with the following criteria, identified by USEPA Method 204, shall be met by the permittee:

a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.

b. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

c. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.

d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

3. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a three-hour average, whenever the emissions unit is in operation.

4. The emissions unit shall be vented to the thermal oxidizer during all solvent based coating operations and shall not vent through any bypass stack, except when employing only emulsion or water based coatings.

5. The permittee shall properly maintain and operate the LEL units in the bypass stack, to ensure that emissions from solvent based coatings do not go directly to the ambient air. These records shall be made available to the Director or his representative upon request during normal business hours.

II. Operational Restrictions (continued)

6. During the required use of the thermal oxidizer, the permittee shall ensure that any inline bypass that could divert solvent laden air from each coating applicator to the ambient air is closed.

In addition, any device in the bypass which indicates a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

7. The thermal oxidizer control system shall be designed and operated according to good engineering practices and the manufacturer's specifications.

III. Monitoring and/or Record Keeping Requirements

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

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

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

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

c. A record of all periods of time during which solvent based coatings were employed, but the VOC emissions were not vented to the thermal oxidizer.

2. The permittee shall install, maintain and operate monitoring device(s) and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all three-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a three-hour average.

3. The permittee shall collect and record the following information daily for all emulsion and water based coatings employed in this emissions unit:

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

b. the VOC content of each coating, in kg/kg of coating solids, as applied, and in pounds per gallon, excluding water and exempt solvents.

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

4. The permittee shall collect and record the following information daily for all coatings and associated cleanup materials, except for emulsion and water based coatings:

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

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

c. The number of gallons of each coating employed, excluding water and exempt solvents.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total uncontrolled VOC emissions from all coatings and from all cleanup materials employed, in pounds or tons.

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

i. The total VOC emission rate while employing solvent based coatings from this emissions unit including controlled VOC emissions from coatings plus uncontrolled emissions from cleanup materials.

5. The permittee shall collect and record the following information daily for all the emulsion and water based coatings and associated cleanup materials employed in this emissions unit:

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

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

c. The number of gallons of each coating employed, excluding water and exempt solvents.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total VOC emissions from all coatings employed and from all coatings and cleanup materials employed, in pounds or tons.

h. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

6. The permittee shall record the following information daily:

a. The total daily VOC emissions from this emissions unit, i.e., the sum of the values from A.III.4.i and A.III.5.g (for coatings and cleanup materials) .

b. The total operating hours of the coating line.

c. The average hourly VOC emission rate, in pounds/hr.

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

7. The permittee shall collect and record monthly the following information for all coatings and cleanup materials employed in this emissions unit:

a. the cumulative monthly sum of the daily values from A.III.6.a; and

b. the cumulative, to date, VOC emissions for the calendar year, in tons.

8. The permittee shall maintain a calendar month record of all coatings used and the results of Method 24 or any alternative compliance test method approved by the Ohio EPA for determining the VOC content of each coating.

9. The permittee shall inspect and monitor weekly, with a Photoionization Detector or equivalent device, all lines between the the total enclosure of the head of the coater and the thermal oxidizer for escaping VOC emissions and maintain records of the results in accordance with the 1998 Avery Dennison preventive maintenance plan. Line speed shall be near maximum during monitoring.

10. The LEL in the bypass stack shall be monitored daily to ensure the use of the thermal oxidizer during the use of solvent based coatings.

11. The permittee shall maintain records of maintenance and operation of the LEL units which ensure that emissions from solvent based coatings do not go directly to the ambient air, and these records shall be made available to the Director or his representative upon request during normal business hours.

12. Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

IV. Reporting Requirements

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

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

b. All periods when the stack that bypasses the thermal oxidizer was used while employing solvent based coatings in the emissions unit.

2. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the VOC content of any emulsion or water based coating exceeded the applicable limitation of 0.20 kg of VOC per kg of coating solids, as applied.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 45 days after the exceedance(s) occurred.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained in compliance with the minimum pressure differential of 0.007 inch of water.

4. The permittee shall submit deviation (excursion) reports which identify each day during which the average hourly VOC emissions exceeded 8.90 pounds per hour, and the actual average hourly VOC emissions for each such day.

5. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year.

IV. Reporting Requirements (continued)

6. Within 120 days after promulgation of 40 CFR 63 Subpart JJJJ, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report:

a. the name and mailing address of the permittee;

b. the physical location of the source if it is different from the mailing address;

c. identification of the relevant MACT standards and the permittee's compliance date;

d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

7. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR 63 Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

a. the methods used to determine compliance;

b. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart JJJJ;

e. an analysis demonstrating whether the affected source is a major source or an area source;

f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

g. a statement of whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart JJJJ.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine VOC content for all coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or an operator determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

V. Testing Requirements (continued)

2. Emission Limitation:

98% overall reduction by weight (100% capture and 98% destruction) for all coatings except emulsion and water based coatings

Applicable Compliance Method:

Performance testing shall be conducted within 3 months after issuance of this permit and, and within 6 months prior to permit expiration using the following methods:

40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M, Method 204.

Performance testing shall be in accordance with OAC rule 3745-21-10(C).

3. Emission Limitation:

0.20 kilogram of VOC per kilogram of solids, as applied, when employing emulsion or water based coatings

Applicable Compliance Method:

Compliance shall be based upon the use of Method 24, or any alternative compliance method approved by the USEPA for determining the VOC content of each coating, and on the record keeping requirements in Section A.III.4 of these terms and conditions.

4. Emission Limitation:

8.90 lbs VOC/hr on a daily average basis

Applicable Compliance Method: Compliance shall be based on the record keeping requirements in Section A.III.4, 5, and 6 of these terms and conditions.

5. Emission Limitation:

39.0 tons VOC per year

Applicable Compliance Method: Compliance shall be based on the record keeping requirements in Section A.III.4, 5, 6, and 7 of these terms and conditions.

6. Emission Limitation:

0.1 lb per hour ozone

Applicable Compliance Method:

Compliance shall be based on the following equation:

E = (0.014 lb ozone/kW) x (maximum kW of input power for the corona treater)

where,

E = maximum lbs ozone emitted per hour

0.014 lb of ozone per kW is emission factor developed from emissions testing

V. Testing Requirements (continued)

7. Emission Limitation:

0.44 ton per year ozone

Applicable Compliance Method: Multiply the hourly emissions by the actual hours of operation per year and divide by 2000 (lbs/ton).

8.a Emission testing requirements

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

i. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation and capture efficiency limitation for VOC of 98% and100%, respectively .

iii. The following test methods shall be employed to demonstrate compliance with the overall control efficiency for VOC:

Method 25 of 40 CFR, Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR, Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and

Method 204 of 40 CFR Part 51, Appendix M.

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

iv. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northeast District Office of the Ohio EPA and local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

V. Testing Requirements (continued)

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

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

VI. Miscellaneous Requirements

1. The permittee shall employ the plan for preventive maintenance and repair of leaks within the solvent capture and destruction system as submitted to the Ohio EPA on August 10, 1998.

Equipment subject to the plan shall include all ductwork from the enclosures of the heads of the coaters to the thermal oxidizer, the ovens and the thermal oxidizer fan cover.

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: F-3 Coater (K003)

Activity Description: F-3 Coater - Adhesive Coating Line (K003) & F-3 Corona Treater

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
F-3 adhesive coating line with thermal oxidizer #3 & F-3 corona treater; EPA emission unit number K003 (Building #11)	OAC rule 3745-21-09(F)	The emission limitations specified by this rule are less stringent than the emissions limitations specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1) and the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05 PTI # 02-9533	21.73 pounds VOC per hour from the coating line, including cleanup, as a daily average 95.18 tons VOC per year from the coating line, including cleanup 98.3 % overall VOC reduction by weight (100% capture and 98.3% destruction) for all solvent based coatings (See A.I.2.b.) For emulsion and water based coatings, the emission limitation established pursuant to this rule is less stringent than the emission limitation specified in 40 CFR Part 60, Subpart RR, section 60.442(a)(1).
	40 CFR, Part 60, Subpart RR	The control efficiency requirements specified in this rule are less stringent than the control efficiency requirements established pursuant to OAC rule 3745-31-05. 0.20 kg VOC/kg of coating solids applied for emulsion and water based coatings

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart JJJJ	See Sections A.IV.6 and A.IV.7 of these terms and conditions.

2. Additional Terms and Conditions

2.a The permittee shall install and maintain a permanent total enclosure, which complies with the requirements in 40 CFR 60, Reference Method 204, to capture all VOC emissions from this emissions unit.

2.b A solvent based coating is any coating that has a VOC content greater than 0.20 kg VOC per kg coating solids applied.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. This emissions unit shall be enclosed such that all VOC emissions are captured, contained and, when solvent based coatings are being employed, vented to the thermal oxidizer. Compliance with the following criteria, identified by USEPA Method 204, shall be met by the permittee:

a. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.

b. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

c. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.

d. All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.

3. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a three-hour average, whenever the emissions unit is in operation.

4. The emissions unit shall be vented to the thermal oxidizer during all solvent based coating operations and shall not vent through any bypass stack, except when employing only emulsion or water based coatings.

5. The permittee shall properly maintain and operate the LEL units in the bypass stack, to ensure that emissions from solvent based coatings do not go directly to the ambient air. These records shall be made available to the Director or his representative upon request during normal business hours.

6. During the required use of the thermal oxidizer, the permittee shall ensure that any inline bypass that could divert solvent laden air from each coating applicator to the ambient air is closed.

In addition, any device in the bypass which indicates a VOC concentration or temperature change or other parameter in order to alert the permittee of inappropriate bypass use, shall be operated and maintained according to the manufacturer's recommendations, instructions and operating manuals.

7. The thermal oxidizer control system shall be designed and operated according to good engineering practices and the manufacturer's specifications.

III. Monitoring and/or Record Keeping Requirements

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

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

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

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

c. A record of all periods of time during which solvent based coatings were employed, but the VOC emissions were not vented to the thermal oxidizer.

2. The permittee shall install, maintain and operate monitoring device(s) and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside of the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all three-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a three-hour average.

3. The permittee shall collect and record the following information daily for all emulsion and water based coatings employed in this emissions unit:

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

b. the VOC content of each coating, in kg/kg of coating solids, as applied, and in pounds per gallon, excluding water and exempt solvents.

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

4. The permittee shall collect and record the following information daily for all coatings and associated cleanup materials, except for emulsion and water based coatings:

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

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

c. The number of gallons of each coating employed, excluding water and exempt sovents.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total uncontrolled VOC emissions from all coatings and from all cleanup materials employed, in pounds or tons.

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

i. The total VOC emission rate while using solvent based coatings from this emissions unit including controlled VOC emissions from coatings plus uncontrolled emissions from cleanup materials.

5. The permittee shall collect and record the following information daily for all the emulsion and water based coatings employed in this emissions unit:

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

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

c. The number of gallons of each coating employed, excluding water and exempt solvents.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The VOC content of each cleanup material, in pounds per gallon.

g. The total VOC emissions from all coatings employed and from all coatings and cleanup materials employed, in pounds or tons.

h. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for Cvoc,2.

6. The permittee shall record the following information daily:

a. The total daily VOC emissions from this emissions unit, i.e., the sum of the values from A.III.4.i and A.III.5.g (for coatings and cleanup materials).

b. The total operating hours of the coating line.

c. The average hourly VOC emission rate, in pounds/hr.

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

7. The permittee shall collect and record monthly the following information for all coatings and cleanup materials employed in this emissions unit:

a. the cumulative monthly sum of the daily values from A.III.6.a; and

b. the cumulative, to date, VOC emissions for the calendar year, in tons.

8. The permittee shall maintain a calendar month record of all coatings used and the results of Method 24 or any alternative compliance test method approved by the Ohio EPA for determining the VOC content of each coating.

9. The permittee shall inspect and monitor weekly, with a Photoionization Detector or equivalent device, all lines between the the total enclosure of the head of the coater and the thermal oxidizer for escaping VOC emissions and maintain records of the results in accordance with the 1998 Avery Dennison preventive maintenance plan. Line speed shall be near maximum during monitoring.

10. The LEL in the bypass stack shall be monitored daily to ensure the use of the thermal oxidizer during the use of solvent based coatings.

11. The permittee shall maintain records of maintenance and operation of the LEL units which ensure that emissions from solvent based coatings do not go directly to the ambient air, and these records shall be made available to the Director or his representative upon request during normal business hours.

12. Any calculations used to determine compliance shall be maintained at the facility and made available to the Director or his representative, upon request, during normal business hours.

IV. Reporting Requirements

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

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

b. All periods when the stack that bypasses the thermal oxidizer was used while employing solvent based coatings in the emissions unit

2. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the VOC content of any emulsion or water based coating exceeded the applicable limitation of 0.20 kg of VOC per kg of coating solids, as applied.

The notification shall include a copy of such record and shall be sent to the Northeast District Office of the Ohio EPA within 45 days after the exceedance(s) occurred.

3. The permittee shall submit quarterly deviation (excursion) reports that identify all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained in compliance with the minimum pressure differential of 0.007 inch of water.

4. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year.

5. The permittee shall submit deviation (excursion) reports which identify each day during which the average hourly VOC emissions exceeded 21.73 pounds per hour, and the actual average hourly VOC emissions for each such day.

IV. Reporting Requirements (continued)

6. Within 120 days after promulgation of 40 CFR 63 Subpart JJJJ, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standards. If the permittee is subject to the final standards, the following information shall also be included in the Initial Notification Report:

a. the name and mailing address of the permittee;

b. the physical location of the source if it is different from the mailing address;

c. identification of the relevant MACT standards and the permittee's compliance date;

d. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and

e. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.

7. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR 63 Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

a. the methods used to determine compliance;

b. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

c. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

d. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR 63 Subpart JJJJ;

e. an analysis demonstrating whether the affected source is a major source or an area source;

f. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

g. a statement of whether or not the permittee has complied with the requirements of 40 CFR 63 Subpart JJJJ.

V. Testing Requirements

1. USEPA Method 24 shall be used to determine the VOC contents for all coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

V. Testing Requirements (continued)

2. Emission Limitation:

98.3% overall VOC reduction by weight (100% capture and 98.3% destruction) for all coatings except emulsion and water based coatings

Applicable Compliance Method:

Performance testing shall be conducted within 3 months after issuance of this permit and, and within 6 months prior to permit expiration using the following methods:

40 CFR Part 60, Appendix A, Methods 25, 25A and 40 CFR Part 51, Appendix M, Method 204.

Performance testing shall be in accordance with OAC rule 3745-21-10(C).

3. Emission Limitation:

0.20 kilogram of VOC per kilogram of solids, as applied, when employing emulsion or water based coatings

Applicable Compliance Method:

Compliance shall be based upon the use of Method 24, or any alternative compliance method approved by the USEPA for determining the VOC content of each coating, and on the record keeping requirements in Section A.III.3 of these terms and conditions.

4. Emission Limitation:

21.73 lbs VOC/hr on a daily average basis

Applicable Compliance Method: Compliance shall be based on the record keeping requirements in Section A.III.4, 5, and 6 of these terms and conditions.

5. Emission Limitation:

95.18 tons VOC per year

Applicable Compliance Method: Compliance shall be based on the record keeping requirements in Section A.III.3-7 of these terms and conditions.

V. Testing Requirements (continued)

6.a Emission testing requirements

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

i. The emission testing shall be conducted within 3 months after issuance of this permit, and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation and capture efficiency limitation for VOC of 98.3% and 100%, respectively .

iii. The following test method shall be employed to demonstrate compliance with the overall control efficiency limitation for VOC:

Method 25 of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are greater than 50 ppm; or

Method 25A of 40 CFR Part 60, Appendix A, if the VOC concentrations as carbon in the outlet are less than 50 ppm; and

Method 204 of 40 CFR Part 51, Appendix M.

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

iv. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification Northeast District Office of the Ohio EPA and local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

1. The permittee shall employ the plan for preventive maintenance and repair of leaks within the solvent capture and destruction system as submitted to the Ohio EPA on August 10, 1998.

Equipment subject to the plan shall include all ductwork from the enclosures of the heads of the coaters to the thermal oxidizer, the ovens and the thermal oxidizer fan cover.

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: Churn Cleaner (P001)

Activity Description: 670-1 Churn Washer/Solvent Reclaim Unit

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
670-1 Churn Washer/Solvent Reclaim Unit	OAC rule 3745-21-07(G)(2)	The hourly and daily emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05 PTI #02-7431	1.4 pounds of VOC per hour; 33.6 pounds of VOC per day; 6.13 tons of VOC per year

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following records each day the churn washers operate:

a. The company identification of each liquid organic material used.

b. The number of cycles of operation.

c. The number of hours of operation.

d. An estimate of the daily VOC emission rate, in pounds.

e. The average hourly VOC emission rate, in pounds, i.e., d/c.

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

2. The permittee shall keep the following records each day the solvent distillation unit operates:

a. The company identification of each liquid organic material used.

b. The amount of each solvent processed in gallons.

c. The number of hours of operation.

d. An estimate of the daily VOC emission rate, in pounds.

e. The average hourly VOC emission rate, in pounds, i.e., d/c.

3. The permittee shall keep the following records each day this emissions unit operates:

a. An estimate of the total daily VOC emission rate (pounds), by summing the emissions from the churn washers and the distillation unit.

b. An estimate of the total average hourly VOC emission rate (pounds), by summing the average hourly VOC emission rates from the churn washers and from the distillation unit.

IV. Reporting Requirements

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

a. An identification of each day during which the average hourly VOC emissions exceeded 1.4 pounds per hour, and the actual average hourly VOC emissions for each such day.

b. An identification of each day during which the VOC emissions exceeded 33.6 pounds per day, and the actual VOC emissions for each such day.

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Emission Limitation:

33.6 lbs VOC per day

Applicable Compliance Method:

To determine the actual emission rate for volatile organic compounds, the following equations shall be used:

1.a Ec = N X 0.142 lb VOC/cycle

where

Ec = VOC emission rate (lbs/day) from the churns

0.142 = emission factor (lb VOC/cycle), based on the AP-42, Table 4.8-2 emission factor for tank truck cleaning and a maximum solvent usage of 120 gallons per cycle.

N = number of cleaning cycles per day

V. Testing Requirements (continued)

1.b Ed = V X 7.11 lbs/gal X 1 ton/2000 lbs X 0.74 lb VOC/ton

where,

Ed= VOC emission rate (lbs/day) from the solvent distillation unit

V = number of gallons of solvent processed through the distillation unit each day

7.11 = average density of solvent processed through the distillation unit

0.74 = emission factor from AP-42 Table 4.7-1 for waste solvent reclaiming (storage tank vent and loading)

1.c Et = Ec + Ed

where

Et = VOC emission rate (lbs/day) from churns and distillation unit

Ec = VOC emission rate (lbs/day) from churns, as determined above

Ed = VOC emission rate (lbs/day) from solvent distillation unit, as determined above

2. Emission Limitation:

1.4 lbs organic compounds per hour

Applicable Compliance Method:

To determine the average actual emission rate for organic compounds, the following equation shall be used:

Eh = Ec/Hc + Ed/Hc

where

Eh = average organic compound emission rate (lbs/hr)

Ec = VOC emission rate (lbs/day) from the churns, as determined in A.V.1.

Ed = VOC emission rate (lbs/day) from the distillation unit, as determined in A.V.1.

Hc = hours of operation per day for the churns

Hd = hours of operation per day for the distillation unit

3. Emission Limitation:

6.13 tons per year

Applicable Compliance Method:

Sum the total daily VOC emissions determined by the record keeping in section A.III and divide by 2000 (pounds/ton).

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: Mixer (P006)

Activity Description: 670-5 50-HP Compounding Mixer

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
670-5 50-HP Compounding Mixer	OAC rule 3745-21-07(G)(2)	The hourly and daily emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05 PTI #02-7431	1.19 pounds per hour VOC 28.56 pounds per day VOC 5.21 tons per year VOC

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following records each day the compounding mixer operates:

a. The total number of batches operated.

b. The total number of batches in open top drums.

c. The total number of batches in churns.

d. An estimate of the daily VOC emission rate, in pounds.

e. The number of hours of operation.

f. The average hourly VOC emissions, in pounds per hour.

IV. Reporting Requirements

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

a. An identification of each day during which the hourly VOC emissions exceeded 1.19 pounds per hour, and the actual hourly VOC emissions for each such day.

b. An identification of each day during which the VOC emissions exceeded 28.56 pounds per day, and the actual VOC emissions for each such day.

2. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Emission Limitation:

28.56 lbs VOC per day

Applicable Compliance Method:

To determine the emission factor, this mixer was treated as a cold cleaner with agitation. The emission factor, derived using AP-42, 5th edition, 1981, section 4.6 on Solvent Degreasing, and adding a 50% increment to allow for agitation, is 0.12 lb/hr-ft2.

The daily VOC emissions are calculated by the following:

(0.12 lb/hr-ft2) x (1 hr/batch) x (number of batches for open-top drum) x (3.69 ft2) +
(0.12 lb/hr-ft2) x (1 hr/batch) x (number of batches for portable churn) x (12.57 ft2)

where, the open-top drums with a diameter of 26 inches and surface area of 3.69 ft2 and portable churns with a diameter of 48 inches and surface area of 12.57 ft2 are used.

2. Emission limitation:

0.19 lbs VOC per hour.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Section A.III.1 of these terms and conditions.

3. Emission Limitation:

5.21 tons per year

Applicable Compliance Method:

Sum the total daily VOC emissions determined by the record keeping in section A.III.1 and divide by 2000 (pounds/ton).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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