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

01/31/01

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V**
**Chapter 3745-77 permit**

03-22-02-0019
Sandusky Limited
Ron Abbott
3130 West Monroe Street
Sandusky, OH 44870

Dear Ron Abbott:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 04/28/99. The comment period 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 or with agreed-upon changes, then you have the opportunity to schedule a meeting with us to discuss your concerns.

Please contact Jim Orlemann, Engineering Section Manager, 614-644-3592, or you can telefax your request to (614) 644-3681, within fourteen (14) days from receipt of this letter if a meeting is desired. If a request for a meeting is not received within fourteen (14) days of receipt of this letter, we will forward this proposed permit (as written, or with agreed-upon changes) to USEPA for approval.

Very truly yours,

Thomas G. Rigo

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

cc: Northwest District Office
Becky Castle, DAPC PMU

**Ohio EPA**
State of Ohio Environmental Protection Agency

# PRELIMINARY PROPOSED TITLE V PERMIT

Date: 01/31/01
Effective Date: **To be entered upon final issuance**
Expiration Date: **To be entered upon final issuance**

This document constitutes issuance to:

Sandusky Limited
3130 West Monroe Street
Sandusky, OH 44870

of a Title V permit for Facility ID: 03-22-02-0019

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
B009 (Boiler)
15.0 mmBTU/hr natural gas fired boiler

K001 (Printer #1)
Rotogravure Printer which uses solvent-based and water-based ink

K002 (Printer #2)
Rotogravure Printer which uses solvent-based and water-based ink

K003 (Printer #3)
Rotogravure Printer which uses solvent-based and water-based ink

K004 (Printer #4)
Rotogravure Printer which uses solvent-based and water-based ink

K006 (R&D Printer )
Rotogravure Printer which uses water-based ink

P009 (C-2 Cast Coater)
C-2 Cast Coater Line includes coating stations and vinyl expansion oven

P018 (Plastisol Bag Dump)
(2) Plastisol bag dump stations; east and west

P019 (Littleford Mixers)
(2) Littleford Mixers; east and west

P020 (Purnell Mixer)
Purnell Mixer

P021 (Ribbon Blender #1)
Ribbon Blender #1

P022 (Ribbon Blender #2)
Ribbon Blender #2

P023 (Ribbon Blender #3)
Ribbon Blender #3

P024 (Ribbon Blender #4)
Ribbon Blender #4

P025 (C-1 Cast Coater)
Cast Coater Line includes coating stations, expansion ovens, and a fume eliminator

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:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

_____

Christopher Jones
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

### 1. Monitoring and Related 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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 <u>monitoring, recordkeeping, and reporting requirements</u> 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:

hot oil heaters, emissions unit B002;
air makeup units, emissions unit B003;
roll mill #1, emissions unit P001;
vinyl sheet #1, emissions unit P002;
lam lines #1-#5, emissions unit P003;
strike off press, emissions unit P007;
ink mixing area, emissions unit P010;
ink storage area drums, emissions unit P011;
roll mill R&D lab, emissions unit P012;
embosser, emissions unit P026;
extruder, emissions unit P027;
vinyl sheet R&D, emissions unit R013;
lam R&D, emissions unit R014;
boiler #1, emissions unit Z001;
boiler #2, emissions unit Z002; and
space heaters, emissions unit Z004.

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 (PTI) for the emissions unit.

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler (B009)

**Activity Description:** 15.0 mmBTU/hr natural gas fired boiler

## 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 |
|---|---|---|
| 15 mmBtu/hour natural gas-fired boiler | OAC rule 3745-17-10(B) | 0.020 pound particulate emissions (PE)/mmBtu of actual heat input. |
| | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule. |
| | 40 CFR part 60, Subpart Dc | refer to section A.II.1 of the terms and conditions of this permit. |

**2. Additional Terms and Conditions**

**2.a** Since natural gas is the only fuel fired in this emissions unit, no SO2 emission limitation is established by OAC Chapter 3745-18 for this emissions unit.

### II. Operational Restrictions

**1.** The permittee shall burn only natural gas as fuel in this emissions unit.

### III. Monitoring and/or Record Keeping Requirements

**1.** For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

### IV. Reporting Requirements

**1.** The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

### V. Testing Requirements

**1.** Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

## V. Testing Requirements (continued)

**1.a** Emission Limitation: 0.020 pound PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee shall demonstrate compliance with this emission limitation by multiplying the maximum hourly natural gas combustion rate (15,000 cubic feet) by the appropriate AP-42 emission factor from Table 1.4-2 (revised 7/98) of 1.9 pounds PE/mm cu. ftt), then and dividing by the maximum heat input to the boiler (15 mmBtu/hour).

If required, the method to be employed to demonstrate compliance with the emission limitation shall be OAC rule 3745-17-03(B)(9).

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

Applicable Compliance Method: If required, the method to be employed to demonstrate compliance with the emission limitation shall beOAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 15 mmBtu/hour natural gas-fired boiler | OAC rule 3745-31-05 (PTI No. 03-9835) | 0.14 pound nitrogen oxides (NOx)/mmBtu of actual heat input. |

**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

**1.** Compliance Methods Requirements: Compliance with the emission limitation(s) in section B.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

**1.a** Emission Limitation: 0.14 pound NOx/mmBtu of actual heat input

Applicable Compliance Method: The permittee shall demonstrate compliance with this emission limitation by multiplying the maximum hourly natural gas combustion rate (15,000 cubic feet) by the appropriate AP-42 emission factor from Table 1.4-1 (revised 7/98) of 100 pounds NOx/mm cu. ft, ) and then dividing by the maximum heat input to the boiler (15 mmBtu/hour).

If required, the method to be employed to demonstrate compliance with the emission limitation shall be Method 7, which is located in 40 CFR Part 60, Appendix A.

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Printer #1 (K001)

**Activity Description:** Rotogravure Printer which uses solvent-based and water-based ink

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 4-station rotogravure printer - #1 Lembo printer, with thermal incinerator | OAC rule 3745-21-09(H)(2) | Refer to section A.I.2.a of the terms and conditions of this permit. |

**2. Additional Terms and Conditions**

**2.a** The vinyl coating line shall be equipped with a capture system and thermal oxidizer which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC), as determined under paragraph (C) of OAC rule 3745-21-10:

i. a capture efficiency which is at least 75 percent, by weight; and

ii. a control efficiency which is at least 90 percent, by weight.

**2.b** The permittee shall employ a permanent total enclosure around this emissions unit.

### II. Operational Restrictions

**1.** 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 (equivalent to at least 200 feet/minute airflow into the permanent total enclosure through all natural draft openings), whenever the emissions unit is in operation.

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

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

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

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

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

The permittee shall record and maintain the following information on a daily basis:

a. the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day; and

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly summaries that include a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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

a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section A.II.1 of the terms and conditions of this permit; and

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

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

## V. Testing Requirements

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

**1.a** the emission testing shall be conducted within 6 months after permit issuance and every 2.5 years thereafter;

**1.b** the emission testing shall be conducted to demonstrate compliance with the control efficiency limitation for VOC of 90%, by weight;

**1.c** the following test method(s) shall be employed to demonstrate compliance with control efficiency limitation for VOC: the methods and procedures specified in OAC rule 3745-21-10; and

## V. Testing Requirements (continued)

**1.d** the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Director (the appropriate Ohio EPA District Office or local air agency).

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 4-station rotogravure printer - #1 Lembo printer, with thermal incinerator | none | none |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Printer #2 (K002)

**Activity Description:** Rotogravure Printer which uses solvent-based and water-based ink

## 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 |
|---|---|---|
| 5-station rotogravure printer - #2 Lembo printer | OAC rule 3745-21-09(H)(1) | Refer to section A.I.2.a of the terms and conditions of this permit. |

**2. Additional Terms and Conditions**

**2.a** The volatilel organic compounds (VOC) content of the coatings employed in the vinyl coating line, as determined under paragraph (B) of rule 3745-21-10 of the Administrative Code, shall not exceed the following limitation:

i. 4.8 pounds of VOC/gallon of coating, excluding water and exempt solvents; or

ii. twenty-five percent VOC by volume of the volatile matter.

### II. Operational Restrictions

**1.** Each coating employed in this emissions unit shall comply with the VOC emission limitation specified in section A.I.2.a of the terms and conditions of this permit on an "as applied" basis.

### III. Monitoring and/or Record Keeping Requirements

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

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

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

c. the percent, by volume, of VOC of the volatile matter.

This information does not have to be kept on a line-by-line basis. Also, if an owner or operator mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

### IV. Reporting Requirements

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

## V. Testing Requirements

**1.** Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

Emission Limitation: 4.8 pounds of VOC/gallon of coating, excluding water and exempt solvents; or 25 percent VOC, by volume, of the volatile matter

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in section A.III.1 of the terms and conditions of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

## 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 |
|---|---|---|
| 5-station rotogravure printer - #2 Lembo printer | none | none |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Printer #3 (K003)

**Activity Description:** Rotogravure Printer which uses solvent-based and water-based ink

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 4-station rotogravure printer - #3 Lembo printer, with thermal incinerator | OAC rule 3745-21-09(H)(2) | Refer to section A.I.2.a of the terms and conditions of this permit. |

**2. Additional Terms and Conditions**

**2.a** The vinyl coating line shall be equipped with a capture system and thermal oxidizer which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC), as determined under paragraph (C) of OAC rule 3745-21-10:

i. a capture efficiency which is at least 75 percent, by weight; and

ii. a control efficiency which is at least 90 percent, by weight.

**2.b** The permittee shall employ a permanent total enclosure around this emissions unit.

### II. Operational Restrictions

**1.** 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 (equivalent to at least 200 feet/minute airflow into the permanent total enclosure through all natural draft openings), whenever the emissions unit is in operation.

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

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

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

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

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

The permittee shall record and maintain the following information on a daily basis:

a. the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day; and

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly summaries that include a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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

a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section A.II.1 of the terms and conditions of this permit; and

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

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

## V. Testing Requirements

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

**1.a** the emission testing shall be conducted within 6 months after permit issuance and every 2.5 years thereafter;

**1.b** the emission testing shall be conducted to demonstrate compliance with the control efficiency limitation for VOC of 90%, by weight;

**1.c** the following test method(s) shall be employed to demonstrate compliance with control efficiency limitation for VOC: the methods and procedures specified in OAC rule 3745-21-10; and

## V. Testing Requirements (continued)

**1.d** the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Director (the appropriate Ohio EPA District Office or local air agency).

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 4-station rotogravure printer - #3 Lembo printer, with thermal incinerator | none | none |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

**None**

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Printer #4 (K004)

**Activity Description:** Rotogravure Printer which uses solvent-based and water-based ink

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 4-station rotogravure printer - #4 Lembo printer, with thermal incinerator | OAC rule 3745-21-09(H)(2) | Refer to section A.I.2.a of the terms and conditions of this permit. |

**2. Additional Terms and Conditions**

**2.a** The vinyl coating line shall be equipped with a capture system and thermal oxidizer which are designed and operated to achieve the following efficiencies for volatile organic compounds (VOC), as determined under paragraph (C) of OAC rule 3745-21-10:

i. a capture efficiency which is at least 75 percent, by weight; and

ii. a control efficiency which is at least 90 percent, by weight.

**2.b** The permittee shall employ a permanent total enclosure around this emissions unit.

### II. Operational Restrictions

**1.** 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 (equivalent to at least 200 feet/minute airflow into the permanent total enclosure through all natural draft openings), whenever the emissions unit is in operation.

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

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

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

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

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

The permittee shall record and maintain the following information on a daily basis:

a. the difference in pressure between the permanent total enclosure and the surrounding area(s) throughout the day; and

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

## IV. Reporting Requirements

**1.** The permittee shall submit quarterly summaries that include a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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

a. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in section A.II.1 of the terms and conditions of this permit; and

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

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

## V. Testing Requirements

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

**1.a** the emission testing shall be conducted within 6 months after permit issuance and every 2.5 years thereafter;

**1.b** the emission testing shall be conducted to demonstrate compliance with the control efficiency limitation for VOC of 90%, by weight;

**1.c** the following test method(s) shall be employed to demonstrate compliance with control efficiency limitation for VOC: the methods and procedures specified in OAC rule 3745-21-10; and

## V. Testing Requirements (continued)

**1.d** the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Director (the appropriate Ohio EPA District Office or local air agency).

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| 4-station rotogravure printer - #4 Lembo printer, with thermal incinerator | none | none |

**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:** R&D Printer (K006)

**Activity Description:** Rotogravure Printer which uses water-based ink

## 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 |
|---|---|---|
| 2-head rotogravure vinyl coating line | OAC rule 3745-21-09 (H) | 4.8 pounds volatile organic compounds (VOC)/gallon, excluding water and exempt solvents (refer to section A.I.2.a of the terms and conditions of this permit). |
| | 40 CFR Part 60, Subpart FFF | 1.0 Kg VOC/Kg ink solids (refer to section A.I.2.b of the terms and conditions of this permit). |
| | OAC rule 3745-31-05 (PTI No. 03-10797) | from coating and cleanup operations, 37.3 tons VOC/year (refer to section A.I.2.c of the terms and conditions of this permit). |

**2. Additional Terms and Conditions**

**2.a** The VOC content of the coatings employed in this emissions unit shall not exceed the following limitation (based upon a daily, volume-weighted average):

i. 4.8 pounds of VOC/gallon of coating, excluding water and exempt solvents; or

ii. twenty-five percent VOC by volume of the volatile matter.

**2.b** The VOC content of the coatings employed in this emissions unit shall not exceed 1.0 Kg VOC/Kg coating (ink) solids (based upon a monthly, volume-weighted average).

**2.c** The emissions of VOC from this emissions unit shall not exceed 37.3 tons per year, based upon a rolling, 12-month summation of the monthly VOC emissions from all of the coatings and cleanup materials.

### II. Operational Restrictions

**None**

## III. Monitoring and/or Record Keeping Requirements

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

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

b. the VOC content of each coating, excluding water and exempt solvents, in pounds/gallon (note: if the permittee mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture);

c. the percent, by volume, of VOC of the volatile matter of each coating;

d. the number of gallons (excluding water and exempt solvents) of each coating employed;

e. the VOC emission rate from each coating employed, in pounds [(b) x (d)];

f. the VOC emission rate from all coatings employed, in tons [summation of (e)/2000 for all coatings];

g. the name and identification number of each cleanup material employed;

h. the VOC content of each cleanup material, in pounds/gallon;

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

j. the VOC emission rate from each cleanup material employed, in pounds [(h) x (i)];

k. the VOC emission rate from all cleanup materials employed, in tons [the summation of (j)/2000];

l. the total VOC emission rate from all coatings and cleanup materials employed [(f) + (k)]; and

m. the rolling, 12-month summation of the VOC emissions from all of the coatings and cleanup materials.

**2.** The permittee shall calculate and record the monthly, volume-weighted average VOC content of the coatings (inks) according to one of the following procedures:

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

**2.a** Procedure One:

i. Determine and record the VOC content and amount of each coating used at each print head, including the VOC content and amount of diluent solvent, for any time periods when VOC emission control equipment is not used.

ii. Compute the weighted average VOC content by the equation specified in 40 CFR Part 60, section 60.583(b)(2).

iii. The weighted average VOC content of the coating materials shall be calculated over a period that does not exceed one calendar month, or four consecutive weeks. A facility that uses an accounting system based on quarters consisting of two 28 calendar day periods and one 35 calendar day period may use an averaging period of 35 calendar days four times per year, provided the use of such an accounting system is documented in the initial performance test.

iv. Each determination of the weighted average VOC content shall constitute a performance test for any period when VOC emission control equipment is not used. Results of the initial performance test must be reported to the Director. Reference Method 24 or coating material manufacturers' formulation data along with plant blending records (if plant blending is done) may be used to determine VOC content. The Director may require the use of Reference Method 24 if there is a question concerning the accuracy of the coating material manufacturer's data or plant blending records.

v. If, during the time periods when emission control equipment is not used, all coating materials used contain less than 1.0 kilogram VOC per kilogram ink solids, the permittee is not required to calculate the weighted average VOC content, but must verify and record the VOC content of each coating material (including any added dilution solvent) used as determined by Reference Method 24, coating material manufacturers' formulation data, or plant blending records.

**2.b** Procedure Two:

i. The permittee may determine the weighted average VOC content using an inventory system. The inventory system shall accurately account to the nearest kilogram for the VOC content of all coatings and dilution solvent used, recycled, and discarded for each affected facility during the averaging period. Separate records must be kept for each affected facility.

ii. To determine VOC content of coatings and dilution solvent used or recycled, Reference Method 24 or ink manufacturers' formulation data must be used in combination with plant blending records (if plant blending is done) or inventory records or purchase records for new coating materials or dilution solvent.

iii. For coatings to be discarded, only Reference Method 24 shall be used to determine the VOC content. Coating materials to be discarded may be combined prior to measurement of volume or weight and testing by Reference Method 24.

iv. The Director may require the use of Reference Method 24 if there is a question concerning the accuracy of the coating manufacturer's data or plant records.

v. The Director shall approve the inventory system of accounting for VOC content prior to the initial performance test.

## IV. Reporting Requirements

**1.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (refer to section A.I.2.a and A.I.2.b of the terms and conditions of this permit). The notification shall include a copy of such record and shall be sent within 30 days following the end of the calendar month.

**2.** The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC. All quarterly reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.

## V. Testing Requirements

**1.** Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

**1.a** Emission Limitation: 37.3 tons VOC/year (from coatings and cleanup materials)

Applicable Compliance Method: Compliance with the annual VOC emission limitation shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

**1.b** Emission Limitation: 4.8 pounds of VOC/gallon of coating, excluding water and exempt solvents; or 25 percent VOC, by volume, of the volatile matter

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

**1.c** Emission Limitation: 1.0 Kg VOC/Kg ink solids

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

## 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-head rotogravure vinyl coating line | OAC rule 3745-31-05 (PTI No. 03-10797) | from coating operations: 20.3 pounds VOC/hour; from cleanup operations: 134.4 pounds VOC/month |

**2. Additional Terms and Conditions**

**2.a** The 20.3 pounds VOC/hour emission limitation from coating usage reflects the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**1.** The permit to install for this emissions unit (K006) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol
TLV (ug/m3): 980,000
Maximum Hourly Emission Rate (lbs/hr): 2.92
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 62.09
Maximum Acceptable Ground-Level Concentration (MAGLC)
(ug/m3): 23,333

Pollutant: methyl ethyl ketone
TLV (ug/m3): 590,000
Maximum Hourly Emission Rate (lbs/hr): 0.45
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9.568
Maximum Acceptable Ground-Level Concentration (MAGLC)
(ug/m3): 14,048

Pollutant: triethylamine
TLV (ug/m3): 40,000
Maximum Hourly Emission Rate (lbs/hr): 0.37
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 7.867
Maximum Acceptable Ground-Level Concentration (MAGLC)
(ug/m3): 952.4

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

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

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

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

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

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

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

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

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

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

## IV. Reporting Requirements

**1.** The permittee shall submit quartrely deviation (excursion) reports that identify all exceedances of the monthly VOC emission limitation from the cleanup operations of 134.4 pounds. All quarterly deviation reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.

## V. Testing Requirements

**1.** Compliance Methods Requirements: Compliance with the emission limitation(s) in section B.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

**1.a** Emission Limitation: 20.3 pounds VOC/hour, from coating material usage

Applicable Compliance Method: Compliance shall be determined by multiplying the maximum coating usage rate (gallons/hour) by the maximum VOC content of all of the coatings (pounds VOC/gallon), as applied.

**1.b** Emission Limitation: 134.4 pounds VOC/month, from cleanup material usage

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

## VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** C-2 Cast Coater (P009)

**Activity Description:** C-2 Cast Coater Line includes coating stations and vinyl expansion oven

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| C-2 cast coater line (coating fabric with vinyl material), with electrostatic precipitator | OAC rule 3745-21-09(G) | Refer to section A.I.2.a of the terms and conditions of this permit. |
| | OAC rule 3745-17-11(B) | 2.55 pounds particulate emissions (PE)/hour (refer to section A.I.2.b of the terms and conditions of this permit). |
| | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule. |

**2. Additional Terms and Conditions**

**2.a** The permittee shall not cause, allow or permit the discharge into the ambient air of any VOC emissions in excess of 2.9 pounds of VOC/gallon of coating, excluding water and exempt solvents.

**2.b** The permittee shall employ an electrostatic precipitator (ESP) to control the particulate emissions from this emissions unit.

### II. Operational Restrictions

**1.** Each coating employed in this emissions unit shall comply with the VOC emission limitation specified in section A.I.2.a of the terms and conditions of this permit on an "as applied" basis.

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

**3.** The primary and secondary voltage (V) and current (amps) recorded at each transformer set within the ESP shall fall within the range of values recorded during the most recent emission test which showed that the emissions unit was in compliance with the particulate emissions limit.

**4.** The spark rate (sparks/minute) recorded in each section within the ESP shall not exceed the highest value recorded during the most recent emission test which showed that the emissions unit was in compliance with the particulate emission limit.

## III. Monitoring and/or Record Keeping Requirements

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

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

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

This information does not have to be kept on a line-by-line basis. Also, if an owner or operator mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

**2.** The permittee shall continuously monitor and record the following information on an daily basis during any operation of the ESP:

a. the primary and secondary voltage, in volts (V), and current, in milliamps, for each transformer set in the ESP; and

b. the spark rate, in sparks/minute, in each section of the ESP.

## IV. Reporting Requirements

**1.** The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). A copy of such record shall be sent to the Director within thirty days following the end of the calendar month.

**2.** The permittee shall submit quartrly deviation (excursion) reports that identify:

a. any record of primary and/or secondary voltage and/or current values which exceeds the range of values recorded for each transformer set during the most recent emission test which showed that the emissions unit was in compliance with the particulate emission limit; and

b. any record of a spark rate which exceeds the highest value recorded in each section within the ESP during the most recent emission test which showed that the emissions unit was in compliance with the particulate emission limit.

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

## V. Testing Requirements

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

**1.a** The emission testing shall be conducted within 6 months of the issuance of this permit;

**1.b** The emission testing shall be conducted to demonstrate compliance with the allowable mass PE rate;

**1.c** The following test method(s) shall be employed to demonstrate compliance with the allowable mass PE rate: Method 5, which is located in 40 CFR Part 60, Appendix A; and

**1.d** The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Director (the appropriate Ohio EPA District Office or local air agency).

**1.e** During each test run, the primary and secondary voltage and current at each ESP transformer set and the spark rate in each ESP section shall be recorded.

The recorded primary and secondary voltage and current values shall be used to establish an acceptable operating range or value for each ESP operating parameter.

## V. Testing Requirements (continued)

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

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

**3.a** Emission Limitation: 2.55 pounds PE/hour

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly PE limitation based upon the results of emission testing conducted pursuant to Methods 1 - 5 of 40 CFR Part 60, Appendix A.

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

Applicable Compliance Method: If required, the method to be employed to demonstrate compliance with the VE limitation shall be OAC rule 3745-17-03(B)(1).

**3.c** Emission Limitation: 2.9 pounds of VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

## 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 |
|---|---|---|
| C-2 cast coater line (coating fabric with vinyl material), with electrostatic precipitator | none | none |

**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

**1.** The permittee shall continue to investigate the availability and use of low volatility or solvent free stabilizers for the plastisol coatings used at the facility. An annual report shall be submitted to the Ohio EPA, DAPC-NWDO by January 15 of each year detailing the success achieved in reducing the amount of OC emitted from vinyl cast coating operations. This reporting requirement shall terminate upon the permittee's successful use of low volatility or solvent free stabilizers for the plastisol coatings or the promulgation of a MACT standard for vinyl cast coating operations.

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Plastisol Bag Dump (P018)

**Activity Description:** (2) Plastisol bag dump stations; east and west

## 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 |
|---|---|---|
| product bag dumping stations {north and south}, with 3 baghouses | OAC rule 3745-17-11(B) | 7.8 pounds particulate emissions (PE)/hour (refer to section A.I.2.a of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule. |

**2. Additional Terms and Conditions**

**2.a** The total PE from all 3 baghouse stacks combined shall not exceed 7.8 pounds PE/hour.

**2.b** The permittee shall employ 3 baghouses to control all of the PE from this operation.

### II. Operational Restrictions

**1.** The pressure drop across each baghouse shall be maintained within the range of 2 - 10 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

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

### IV. Reporting Requirements

**1.** The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any of the 3 baghouses did not comply with the allowable range specified in section A.II.1 of the terms and conditions of this permit. All quarterly deviation reports shall be submitted in accordance with Paragraph A.1.c of the General Terms and Conditions of this permit.

### V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation: 7.8 pounds PE/hour

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly PE limitation by multiplying the emissions unit's maximum process weight rate (9000 pounds/hour) by an emission factor of 0.5 percent loss, taking into account the estimated capture (100%) and control (97%) efficiencies of the baghouses.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| product bag dumping stations {north and south}, with 3 baghouses | OAC rule 3745-31-05 (PTI No. 03-6416) | 1.62 pounds particulate emissions (PE)/hour |

**2. Additional Terms and Conditions**

**2.a** The 1.62 pounds PE/hour emission limitation reflects the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

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

**1.a** Emission Limitation: 1.62 pounds PE/hour

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly PE limitation by multiplying the emissions unit's maximum process weight rate (9000 pounds/hour) by an emission factor of 0.5 percent loss, taking into account the estimated capture (100%) and control (97%) efficiencies of the baghouses.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be Methods 1 - 5, which are located in 40 CFR Part 60, Appendix A.

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Littleford Mixers (P019)

**Activity Description:** (2) Littleford Mixers; east and west

## 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 |
|---|---|---|
| Littleford plastic mixers, with baghouse | OAC rule 3745-17-11(B) | 6.7 pounds particulate emissions (PE)/hour |
| | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule. |

**2. Additional Terms and Conditions**

**2.a** The permittee shall employ a baghouse to control all of the PE from this operation.

### II. Operational Restrictions

**1.** The pressure drop across the baghouse shall be maintained within the range of 2 - 10 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

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

### IV. Reporting Requirements

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

### V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation: 6.7 pounds PE/hour

Applicable Compliance Method: The permittee shall determine compliance with the hourly PE limitation by multiplying the emissions unit's maximum process weight rate (7.50 tons/hour) by the appropriate AP-42 emission factor from Table 5.13-1, revised 2/72 (5.0 pounds PE/ton), taking into account the estimated baghouse capture (100%) and control (97%) efficiencies.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Littleford plastic mixers, with baghouse | OAC rule 3745-31-05 (PTI No. 03-6416) | 1.36 pounds particulate emissions (PE)/hour |

**2. Additional Terms and Conditions**

**2.a** The 1.36 pounds PE/hour emission limitation reflects the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

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

**1.a** Emission Limitation: 1.36 pounds PE/hour

Applicable Compliance Method: The permittee shall determine compliance with the hourly PE limitation by multiplying the emissions unit's maximum process weight rate (7.50 tons/hour) by the appropriate AP-42 emission factor from Table 5.13-1, revised 2/72 (5.0 pounds PE/ton), taking into account the estimated baghouse capture (100%) and control (97%) efficiencies.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be Methods 1 - 5, which are located in 40 CFR Part 60, Appendix A.

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Purnell Mixer (P020)

**Activity Description:** Purnell 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 |
|---|---|---|
| Purnell horizontal PVC mixer, with baghouse | OAC rule 3745-17-11(B) | 5.6 pounds particulate emissions (PE)/hour |
| | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule. |

**2. Additional Terms and Conditions**

**2.a** The 5.6 pounds PE/hour emission limitation is greater than the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**2.b** The permittee shall employ a baghouse to control all of the PE from this operation.

### II. Operational Restrictions

**1.** The pressure drop across the baghouse shall be maintained within the range of 2 - 10 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

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

### IV. Reporting Requirements

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

### V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation: 5.6 pounds PE/hour

Applicable Compliance Method: The permittee shall determine compliance with the hourly PE limitation by multiplying the emissions unit's maximum process weight rate (6 tons/hour) by the appropriate AP-42 emission factor from Table 5.13-1, revised 2/72 (5.0 pounds PE/ton), taking into account the estimated baghouse capture (100%) and control (97%) efficiencies.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Purnell horizontal PVC mixer, with baghouse | OAC rule 3745-31-05 (PTI No. 03-6416) | 1.08 pounds particulate emissions (PE)/hour |

**2. Additional Terms and Conditions**

**2.a** The 1.08 pounds PE/hour emission limitation reflects the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**None**

### IV. Reporting Requirements

**None**

### V. Testing Requirements

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

**1.a** Emission Limitation: 1.08 pounds PE/hour

Applicable Compliance Method: The permittee shall determine compliance with the hourly PE limitation by multiplying the emissions unit's maximum process weight rate (6 tons/hour) by the appropriate AP-42 emission factor from Table 5.13-1, revised 2/72 (5.0 pounds PE/ton), taking into account the estimated baghouse capture (100%) and control (97%) efficiencies.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be Methods 1 - 5, which are located in 40 CFR Part 60, Appendix A.

### VI. Miscellaneous Requirements

**None**

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Ribbon Blender #1 (P021)

**Activity Description:** Ribbon Blender #1

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| vinyl compound ribbon blender #1, with baghouse | OAC rule 3745-17-11(B) | 12.5 pounds particulate emissions (PE)/hour (refer to section A.I.2.a of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule |

**2. Additional Terms and Conditions**

**2.a** The combined PE rate from emissions units P021, P022, P023 and P024 shall not exceed 12.5 pounds/hour.

**2.b** The permittee shall employ a baghouse to control all of the PE from this operation.

### II. Operational Restrictions

**1.** The pressure drop across the baghouse shall be maintained within the range of 2 - 5 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

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

### IV. Reporting Requirements

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

### V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation: 12.5 pounds PE/hour

Applicable Compliance Method: The permittee shall determine compliance with the hourly PE limitation for those emissions units subject to the grouping provisions by multiplying the emissions unit's combined maximum process weight rate (2 tons/hour) by the appropriate AP-42 emission factor from Table 5.13-1, revised 2/72 (10.0 pounds PE/ton), taking into account the estimated baghouse capture (100%) and control (97%) efficiencies.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| vinyl compound ribbon blender #1, with baghouse | none | none |

**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:** Ribbon Blender #2 (P022)

**Activity Description:** Ribbon Blender #2

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| vinyl compound ribbon blender #2, with baghouse | OAC rule 3745-17-11(B) | 12.5 pounds particulate emissions (PE)/hour (refer to section A.I.2.a of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule |

**2. Additional Terms and Conditions**

**2.a** The combined PE rate from emissions units P021, P022, P023 and P024 shall not exceed 12.5 pounds/hour.

**2.b** The permittee shall employ a baghouse to control all of the PE from this operation.

### II. Operational Restrictions

**1.** The pressure drop across the baghouse shall be maintained within the range of 2 - 5 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

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

### IV. Reporting Requirements

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

### V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation: 12.5 pounds PE/hour

Applicable Compliance Method: The permittee shall determine compliance with the hourly PE limitation for those emissions units subject to the grouping provisions by multiplying the emissions unit's combined maximum process weight rate (2 tons/hour) by the appropriate AP-42 emission factor from Table 5.13-1, revised 2/72 (10.0 pounds PE/ton), taking into account the estimated baghouse capture (100%) and control (97%) efficiencies.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| vinyl compound ribbon blender #2, with baghouse | none | none |

**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:** Ribbon Blender #3 (P023)

**Activity Description:** Ribbon Blender #3

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| vinyl compound ribbon blender #3, with baghouse | OAC rule 3745-17-11(B) | 12.5 pounds particulate emissions (PE)/hour (refer to section A.I.2.a of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule |

**2. Additional Terms and Conditions**

**2.a** The combined PE rate from emissions units P021, P022, P023 and P024 shall not exceed 12.5 pounds/hour.

**2.b** The permittee shall employ a baghouse to control all of the PE from this operation.

### II. Operational Restrictions

**1.** The pressure drop across the baghouse shall be maintained within the range of 2 - 5 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

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

### IV. Reporting Requirements

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

### V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation: 12.5 pounds PE/hour

Applicable Compliance Method: The permittee shall determine compliance with the hourly PE limitation for those emissions units subject to the grouping provisions by multiplying the emissions unit's combined maximum process weight rate (2 tons/hour) by the appropriate AP-42 emission factor from Table 5.13-1, revised 2/72 (10.0 pounds PE/ton), taking into account the estimated baghouse capture (100%) and control (97%) efficiencies.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| vinyl compound ribbon blender #3, with baghouse | none | none |

**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:** Ribbon Blender #4 (P024)

**Activity Description:** Ribbon Blender #4

## A. State and Federally Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| vinyl compound ribbon blender #4, with baghouse | OAC rule 3745-17-11(B) | 12.5 pounds particulate emissions (PE)/hour (refer to section A.I.2.a of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule |

**2. Additional Terms and Conditions**

**2.a** The combined PE rate from emissions units P021, P022, P023 and P024 shall not exceed 12.5 pounds/hour.

**2.b** The permittee shall employ a baghouse to control all of the PE from this operation.

### II. Operational Restrictions

**1.** The pressure drop across the baghouse shall be maintained within the range of 2 - 5 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

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

### IV. Reporting Requirements

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

### V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation: 12.5 pounds PE/hour

Applicable Compliance Method: The permittee shall determine compliance with the hourly PE limitation for those emissions units subject to the grouping provisions by multiplying the emissions unit's combined maximum process weight rate (2 tons/hour) by the appropriate AP-42 emission factor from Table 5.13-1, revised 2/72 (10.0 pounds PE/ton), taking into account the estimated baghouse capture (100%) and control (97%) efficiencies.

If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, the method to be employed to demonstrate compliance with this emission limitation shall be OAC rule 3745-17-03(B)(1).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| vinyl compound ribbon blender #4, with baghouse | none | none |

**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:** C-1 Cast Coater (P025)

**Activity Description:** Cast Coater Line includes coating stations, expansion ovens, and a fume eliminator

## 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 |
|---|---|---|
| C-1 cast coating line, with fume filter | OAC rule 3745-17-11(B) | none (refer to section A.I.2.a of the terms and conditions of this permit) |
| | OAC rule 3745-17-07(A) | none (refer to section A.I.2.b of the terms and conditions of this permit) |
| | OAC rule 3745-21-07(G) | none (refer to section A.II.1 of the terms and conditions of this permit) |

**2. Additional Terms and Conditions**

**2.a** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Erie County, which is identified as a P-3 county.

**2.b** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

### II. Operational Restrictions

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

### III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall record and maintain records of the following information each month for this emissions unit:

a. the company identification of each coating and cleanup material; and

b. documentation on whether or not each coating and cleanup material is a photochemically reactive material.

### IV. Reporting Requirements

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

## V. Testing Requirements

**None**

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| C-1 cast coating line, with fume filter | OAC rule 3745-31-05 (PTI No. 03-9835) | 18.30 pounds organic compounds (OC)/hour, from coatings; 1074 pounds OC/month, from cleanup materials<br><br>0.64 pound particulate emissions (PE)/hour |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**1.** The permittee shall employ a fume filter to control the PE from this emissions unit.

**2.** The permittee shall not exceed either 7,500 hours of operation/year or produce more than 8.1 million yards of material/tear in this emissions unit. These restrictions are based on inherent physical limitations for the line that establish it maximum operating capacity.

### III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall collect and record the following information each month for coatings applied in this emissions unit:

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

b. the volume, in gallons, of each coating employed;

c. the mass of OC per volume of each coating, in pounds/gallon, as applied;

d. the total OC emissions from each coating employed, in pounds or tons;

e. the total OC emissions from all coatings employed, in pounds or tons;

f. the total number of hours this emissions unit was in operation;

g. the average hourly OC emission rate for all coatings, in pounds per hour (average); and

h. the total number of yards of material produced.

In conjunction with the above the permittee shall calculate the year-to-date hours of operation for the line and the year-to-date number of yards produced on the line.

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

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

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

b. the volume, in gallons, of each cleanup material employed;

c. the mass of OC per volume of each cleanup material, in pounds/gallon, as applied;

d. the total OC emissions from each cleanup material employed, in pounds or tons; and

e. the total OC emissions from all cleanup materials employed, in pounds or tons.

**3.** The permit to install for this emissions unit (P025) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: stoddard solvent
TLV (ug/m3): 525,000
Maximum Hourly Emission Rate (lbs/hr): 17.94
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 5500.00
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 12,500.00

Pollutant: trimethylbenzene
TLV (ug/m3): 123,000
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 112.20
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2928.57

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

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

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

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

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

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

**5.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

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

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

## IV. Reporting Requirements

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

a. all exceedances of the monthly emission limitation for OC, from cleanup operations, of 1,074 pounds; and

b.all exceedances of the hourly emission limitation for OC, from coating application operations, of 18.3 pounds.

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

## V. Testing Requirements

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

**1.a** the emission testing shall be conducted not later than 6 months after issuance of this permit;

**1.b** the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for OC and PE;

**1.c** the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): OC - Method 25A, which is located in 40 CFR part 60, Appendix A; PE - Methods 1- 5, which are located in 40 CFR part 60, Appendix A; and

**1.d** the test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Director (the appropriate Ohio EPA District Office or local air agency).

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

**3.** Compliance Methods Requirements: Compliance with the emission limitation(s) in section B.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

## V. Testing Requirements (continued)

**3.a** Emission Limitation:
18.30 pounds OC/hour (from coating application)
1074 pounds OC/month (from cleanup material application)

Applicable Compliance Method: Compliance with the hourly OC emission limitation shall be demonstrated through the record keeping requirements established in section B.III.1 of the terms and conditions of this permit and based on the results of emission testing conducted in accordance with the methods and procedures outlined in section B.V.1 of the terms and conditions of this permit.

Compliance with the monthly OC limitation (from cleanup material usage) shall be demonstrated through the record keeping requirements established in section B.III.2 of the terms and conditions of this permit.

**3.b** Emission Limitation: 0.64 pound PE/hour

Appliable Compliance Method: Compliance with the hourly PE limitation shall be based on the results of emission testing conducted in accordance with the methods and procedures outlined in section B.V.1 of the terms and conditions of this permit.

**4.** Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

## VI. Miscellaneous Requirements

**1.** The permittee shall continue to investigate the availability and use of low volatility or solvent free stabilizers for the plastisol coatings used at the facility. An annual report shall be submitted to the Ohio EPA, Division of Air Pollution Control, Northwest District Office by January 15th of each year detailing the success achieved by reducing the amount of OC emitted from vinyl cast coating operations. This reporting requirement shall terminate upon the permittee's successful use of low volatility or solvent free stabilizers for the plastisol coatings or the promulgation of a MACT standard for vinyl cast coating operations.

**********

## THIS IS THE LAST PAGE OF THE PERMIT

**********