State of Ohio Environmental Protection Agency

Street Address:
1800 WaterMark Drive
Columbus, OH 43215-1099

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

Mailing Address:
P.O. Box 1049
Columbus, OH 43216-1049

08/06/98

CERTIFIED MAIL

RE: Preliminary Proposed Title V
Chapter 3745-77 permit

16-67-04-0015
Schneller inc.
JAMES A. DUNCHUCK
P.O. BOX 670
KENT, OH 44240-7109

Dear JAMES A. DUNCHUCK:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 06/11/98. 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: Akron Air Pollution Control
Becky Castle, DAPC PMU

Ohio EPA
State of Ohio Environmental Protection Agency

TITLE V PERMIT

Date: 08/06/98

PRELIMINARY PROPOSED

Effective Date:

Expiration Date:

This document constitutes issuance to:

Schneller inc.
6019 POWDERMILL RD.
KENT, OH 44240-7109

of a Title V permit for Facility ID: 16-67-04-0015

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
K001 (80-LINE)
COATS WATER BASED AND 100% SOLIDS COATINGS ONLY.

K003 (100-LINE)
COATS SOLVENT-BASED AND 100% SOLIDS COATINGS ONTO A VARIETY OF SUBSRATES.

K004 (90-LINE)
COATS PREDOMINATELY SOLVENT-BASED COMPOUNDS ONTO A VARIETY OF SUBSTRATES.

K005 (ROTARY SCREEN)
PRINTS SOLVENT BASED INKS ONTO A VARIETY OF SUBSTATES.

K006 (SILKSCREEN)
SILKSCREEN PRINTING OF SOLVENT BASED INKS.

P002 (COMPOUND DEPT.)
MIXES PIGMENTS INTO BASE COMPOUNDS.

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

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

_____

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</u>, <u>recordkeeping</u>, <u>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

No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

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 <u>Federally Enforceable</u> 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:

B001 - press boiler;
B002 - laminator boiler;
T004 - MEK tank;
T005 - xylene tank;
Z005 - rotary tank #1; and
Z006 - rotary tank #2.

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

The following insignificant emissions units are located at this facility:

B001 - press boiler;
B002 - laminator boiler;
T004 - MEK tank;
T005 - xylene tank;
Z005 - rotary tank #1; and
Z006 - rotary tank #2.

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

2. Should this facility become subject to a promulgated MACT category, within 30 days after the MACT compliance deadline the permittee shall resubmit the Title V application to identify how and when compliance with the MACT was achieved.

Should this facility become subject to a promulgated MACT category, within 30 days after the MACT compliance deadline the permittee shall resubmit the Title V application to identify how and when compliance with the MACT was achieved.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 80-LINE (K001)

Activity Description: COATS WATER BASED AND 100% SOLIDS COATINGS ONLY.

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
Reverse roll coater and rotogravure printing - 80 line coater	OAC rule 3745-31-05 (PTI 16-1601)	26 lbs/hr of volatile organic compounds (VOC) for coatings and cleanup materials 6.7 TPY of VOC, as a rolling 365-day summation for coatings and cleanup materials See A.I.2.a below.
	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, when coating paper
	OAC rule 3745-21-09(G)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, when coating fabric
	OAC rule 3745-21-09(H)	4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, when coating vinyl

2. Additional Terms and Conditions

2.a The emissions of VOC from this emissions unit shall not exceed 6.7 tons per year, based upon a rolling, 365-day summation of the daily emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install (PTI) 16-1601, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC
1	2.0 tons
1-2	3.0 tons
1-3	4.0 tons
1-4	4.3 tons
1-5	4.6 tons
1-6	4.9 tons
1-7	5.2 tons
1-8	5.5 tons
1-9	5.8 tons
1-10	6.1 tons
1-11	6.4 tons
1-12	6.7 tons

After the first 12 calendar months of operation following the issuance of PTI 16-1601, compliance with the annual emission limitation for VOC shall be based upon a rolling, 365-day summation of the daily emissions.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

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

b. the VOC content of each coating used for paper coating, in pounds per gallon, excluding water and exempt solvents;

c. the VOC content of each coating used for fabric coating, in pounds per gallon, excluding water and exempt solvents;

d. the VOC content of each coating used for vinyl coating, in pounds per gallon, excluding water and exempt solvents;

e. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;

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

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

h. the total VOC emissions from all coatings and cleanup materials, in pounds per day;

i. the average hourly VOC emissions rate for all coatings and cleanup materials, in pound(s) per hour (i.e., (h)/(g)); and

j. beginning after the first 12 calendar months of operation following the issuance of PTI 16-1601, the rolling, 365-day summation of the emissions of VOC.

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

2. During the first 12 calendar months of operation following the issuance of PTI 16-1601, the permittee shall record the cumulative emissions of VOC for each calendar month.

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 (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.

2. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the VOC emissions exceeded 26 lbs/hr, and the actual average hourly VOC emissions for each such day.

3. Beginning after the first 12 calendar months of operation following the issuance of PTI 16-1601, the permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of PTI 16-1601, all exceedances of the maximum allowable cumulative emission levels.

4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

1.a Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, when coating paper
2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents, when coating fabric
4.8 pounds of VOC per gallon of coating, excluding water and exempt solvents, when coating vinyl

Applicable Compliance Method:

OAC rule 3745-21-10(B). For each coating employed in the coating line, the permittee shall demonstrate compliance with any applicable VOC content limitation specified in OAC rule 3745-21-09. USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If any such coating has not been analyzed using Method 24 or 24A since January 1, 1991, the permittee shall either conduct a Method 24 or 24A analysis of the coating or obtain a method 24 or 24A analysis of the coating from the coating supplier within one year of the issuance of the Permit to Operate. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

1.b Emission Limitation:

26 lbs/hr of VOC
6.7 TPY of VOC as a rolling, 365-day summation

Applicable Compliance Method:

Recordkeeping of coating and cleanup material usage, VOC content of each coating and cleanup material, and operating hours per day as required by Section A.III.1. Formulation data shall be used to determine the VOC content of each cleanup material. USEPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

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
Reverse roll coater and rotogravure printing - 80 line coater	OAC rule 3745-31-05	1.1 lbs/hr of triethylamine* 4.8 TPY of triethylamine* See B.VI.1 below. *Included in the VOC emissions

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

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

b. the triethylamine content of each coating and cleanup material, in pounds per gallon, as applied;

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

d. the total daily emissions of triethylamine, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. the average hourly triethylamine emissions rate for all coatings and cleanup materials, in pound(s) per hour (average).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the triethylamine emissions exceeded 1.1 lbs/hr, and the actual average hourly triethylamine emissions for each such day.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

1.1 lbs/hr of triethylamine
4.8 TPY of triethylamine

Applicable Compliance Method:

Recordkeeping of coating and cleanup material usage, triethylamine content of each coating and cleanup material, and operating hours per day as required by Section B.III.1.

VI. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the PTI 16-1601 for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the K001 emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3.0 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590.0

Maximum Hourly Emission Rate (lbs/hr): 26.0

Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3): 2178.0

MAGLC (ug/m3): 14047.6

Pollutant: Triethylamine

TLV (mg/m3): 4.1

Maximum Hourly Emission Rate (lbs/hr): 1.1

Predicted 1 Hour Maximum Ground-Level
Concentration (ug/m3): 92.2

MAGLC (ug/m3): 97.62

VI. Miscellaneous Requirements (continued)

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of a modification to the operating permit or the requirement to obtain a new permit to install:

a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;

b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 100-LINE (K003)

Activity Description: COATS SOLVENT-BASED AND 100% SOLIDS COATINGS ONTO A VARIETY OF SUBSRATES.

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
Reverse roll coater and rotogravure printing - 100 line coater	OAC rule 3745-31-05 (PTI 16-1601)	40.7 lbs/hr of volatile organic compounds (VOC) for coatings and cleanup materials
		71.2 TPY of VOC as a rolling, 12-month summation for coatings and cleanup materials
		See A.I.2.a below.
	OAC rule 3745-21-09(B)(6)	See A.I.2.b below.
	OAC rule 3745-21-09(B)(3)(l)	See A.III.3 below.
	OAC rule 3745-21-09(F)	See A.I.2.b below.
	OAC rule 3745-21-09(G)	See A.I.2.b below.
	OAC rule 3745-21-09(H)	See A.I.2.b below.
	40 CFR Part 60 Subpart FFF	See A.1.2.b below.

2. Additional Terms and Conditions

2.a The thermal incinerator shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, and the capture efficiency shall be at least 92.2 percent, by weight.

2.b The limitations specified by this rule are less stringent than the limitations established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The maximum annual operating hours for this emissions unit to apply solvent based materials shall not exceed 3500, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install (PTI) 16-1601, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	292
1-2	583
1-3	875
1-4	1167
1-5	1458
1-6	1750
1-7	2042
1-8	2333
1-9	2625
1-10	2917
1-11	3208
1-12	3500

After the first 12 calendar months of operation following the issuance of PTI 16-1601, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1350 degrees Fahrenheit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:

a. the operating hours for each month; and

b. beginning after the first 12 calendar months of operation following the issuance of PTI 16-1601, the rolling, 12-month summation of the operating hours.

Also, during the first 12 calendar months of operation following the issuance of PTI 16-1601, the permittee shall record the cumulative operating hours for each calendar month.

2. The permittee shall collect and record the following information for each day for the coating line:

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

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

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

d. the total uncontrolled VOC emissions from all coatings and cleanup materials, in pounds per day;

e. the calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds per day (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

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

g. the average hourly VOC emissions rate for all coating and cleanup materials in pound(s) per hour (i.e. (e)/(f)).

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

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

a. the calculated, controlled VOC emission rate from all coatings and cleanup materials, in pounds or tons per month (the sum of the daily values from Section A.III.2.e of these terms and conditions for each month); and

b. beginning after the first 12 calendar months of operation following the issuance of PTI 16-1601, the rolling, 12-month summation of the emissions of VOC.

4. 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 installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit; and

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of PTI 16-1601, all exceedances of the maximum allowable cumulative operating hours levels.

2. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in Section A.II.3 of these terms and conditions.

3. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly VOC emissions exceeded 40.7 lbs/hr, and the actual average hourly VOC emissions for each such day.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC.

5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

6. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit, in tons, and the total operating hours for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

a. The emission testing shall be conducted within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with control efficiency limitations for VOC and allowable mass emission rate(s) for VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1, 2, 3, 4, 25, and 25A of 40 CFR Part 60 Appendix A. The test method(s) which must be employed to demonstrate compliance with capture efficiency and control efficiency limitations for VOC are specified below - if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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 appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using the capture ratio approved on February 2, 1996 by Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the 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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

2.a Emission Limitation:

40.7 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping of coating and cleanup material usage, VOC content of each coating and cleanup material, and the operating hours per day as required by Section A.III.2 above and the emission testing requirements specified in Section A.V.1 above.

V. Testing Requirements (continued)

2.b Emission Limitation:

96 percent control efficiency, by weight
92.2 percent capture efficiency, by weight

Applicable Compliance Method:

Compliance with the control efficiency and capture efficiency shall be determined in accordance with test methods and procedures specified in Section A.V.1 above.

2.c Emission Limitation:

71.2 TPY of VOC as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping as required by Section A.III.3 of these terms and conditions.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Reverse roll coater and rotogravure printing - 100 line coater	OAC rule 3745-31-05	See B.VI.1 below.

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. This permit allows the use of the coatings and cleanup materials specified by the permittee in the PTI 16-1601 for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the K003, K004, and K005 emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3.0 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 14047.6

Pollutant: Toluene

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 4476.2

Pollutant: Cyclohexanone

TLV (mg/m3): 100.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 2380.95

Pollutant: Xylene

TLV (mg/m3): 434.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 10,333.33

VI. Miscellaneous Requirements (continued)

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of a modification to the operating permit or the requirement to obtain a new permit to install:

a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;

b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

* The maximum hourly rate is the combined VOC allowable mass emission rate from K003, K004, and K005 (emissions for these three emissions units go out the same stack).

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 90-LINE (K004)

Activity Description: COATS PREDOMINATELY SOLVENT-BASED COMPOUNDS ONTO A VARIETY OF SUBSTRATES.

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
Reverse roll coater - 90 line coater	OAC rule 3745-31-05 (PTI 16-1601)	19.34 lbs/hr of volatile organic compounds (VOC) for coatings and cleanup materials
		84.7 TPY of VOC for coatings and cleanup materials
		See A.I.2.a below.
	OAC rule 3745-21-09(B)(6)	See A.I.2.b below.
	OAC rule 3745-21-09(B)(3)(l)	See A.III.2 below.
	OAC rule 3745-21-09(F)	See A.I.2.b below.
	OAC rule 3745-21-09(G)	See A.I.2.b below.
	OAC rule 3745-21-09(H)	See A.I.2.b below.

2. Additional Terms and Conditions

2.a The thermal incinerator shall achieve a control (destruction) efficiency which is at least 96%, by weight, and the capture efficiency shall be at least 98.5%, by weight.

2.b The limitations specified by this rule are less stringent than the limitations established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350 degrees Fahrenheit.

III. Monitoring and/or Record Keeping Requirements

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

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

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

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

d. the total uncontrolled VOC emissions from all coatings and cleanup materials, in pounds per day;

e. the calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds per day (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

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

g. the average hourly VOC emissions rate for all coating and cleanup materials in pound(s) per hour (i.e. (e)/(f)).

2. 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 installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit; and

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in Section A.II.2 of these terms and conditions.

2. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the VOC emissions exceeded 19.34 lbs/hr, and the actual average hourly VOC emissions for each such day.

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

4. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year (January through December). These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

a. The emission testing shall be conducted within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with control efficiency limitations for VOC and allowable mass emission rate(s) for VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1, 2, 3, 4, 25, and 25A of 40 CFR Part 60 Appendix A. The test method(s) which must be employed to demonstrate compliance with capture efficiency and control efficiency limitations for VOC are specified below - if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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 appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using the capture ratio approved on February 2, 1996 by Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the 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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

2.a Emission Limitation:

19.34 lbs/hr of VOC
84.7 TPY of VOC

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping of coating and cleanup material usage, VOC content of each coating and cleanup material, and the operating hours per day as required by Section A.III.1 above and the emission testing requirement specified in Section A.V.1 above.

V. Testing Requirements (continued)

2.b Emission Limitation:

96 percent control efficiency by weight
98.5 percent capture efficiency by weight

Applicable Compliance Method:

Compliance with the control efficiency and capture efficiency shall be determined in accordance with test methods and procedures specified in Section A.V.1 above.

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
Reverse roll coater - 90 line coater	OAC rule 3745-31-05	See B.VI.1 below.

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. This permit allows the use of the coatings and cleanup materials specified by the permittee in the PTI 16-1601 application for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the K003, K004, and K005 emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3.0 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 14047.6

Pollutant: Toluene

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 4476.2

Pollutant: Cyclohexanone

TLV (mg/m3): 100.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 2380.95

Pollutant: Xylene

TLV (mg/m3): 434.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 10,333.33

VI. Miscellaneous Requirements (continued)

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of a modification to the operating permit or the requirement to obtain a new permit to install:

a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;

b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

* The maximum hourly rate is the combined VOC allowable mass emission rate from K003, K004, and K005 (emissions for these three emissions units exit the same stack).

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: ROTARY SCREEN (K005)

Activity Description: PRINTS SOLVENT BASED INKS ONTO A VARIETY OF SUBSTATES.

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
Rotary screen printing and rotogravure printing	OAC rule 3745-31-05 (PTI 16-1601)	7.83 lbs/hr of organic compounds (OC) for coatings and cleanup materials 34.3 TPY of OC for coatings and cleanup materials See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	See A.1.2.b below.
	40 CFR Part 60 Subpart FFF	See A.1.2.b below.

2. Additional Terms and Conditions

2.a The thermal incinerator shall achieve a control (destruction) efficiency which is at least 96%, by weight, and the capture efficiency shall be at least 95%, by weight.

2.b The limitations specified by this rule are less stringent than the limitations established pursuant to OAC rule 3745-31-05.

II. Operational Restrictions

1. The average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be less than 1350 degrees Fahrenheit.

III. Monitoring and/or Record Keeping Requirements

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

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

b. the OC content of each coating and cleanup material, in pounds per gallon, as applied;

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

d. the total uncontrolled OC emissions from all coatings and cleanup materials, in pounds per day;

e. the calculated, controlled OC emission rate for all coatings and cleanup materials, in pounds per day (the controlled emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

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

g. the average hourly OC emissions rate for all coating and cleanup materials in pound(s) per hour (i.e. (e)/(f)).

2. 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 installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit; and

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified in Section A.II.2 of these terms and conditions.

2. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the organic compounds emissions exceeded 7.83 lbs/hr, and the actual average hourly organic compounds emissions for each such day.

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

4. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit, in tons, for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

a. The emission testing shall be conducted within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with control efficiency limitations for OC and allowable mass emission rate(s) for VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1, 2, 3, 4, 25, and 25A of 40 CFR Part 60 Appendix A. The test method(s) which must be employed to demonstrate compliance with capture efficiency and control efficiency limitations for VOC are specified below - if applicable. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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 appropriate Ohio EPA District Office or local air agency.

e. The capture efficiency shall be determined using the capture ratio approved on February 2, 1996 by Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the 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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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

2.a Emission Limitation:

7.83 lbs/hr of OC
34.3 TPY of OC

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping of coating and cleanup material usage, organic compound content of each coating and cleanup material, and the operating hours per day as required by Section A.III.1 above and the emission testing requirements specified in Section A.V.1 above.

V. Testing Requirements (continued)

2.b Emission Limitation:

96 percent control efficiency, by weight
95 percent capture efficiency, by weight

Applicable Compliance Method:

Compliance with the control efficiency and capture efficiency shall be determined in accordance with test methods and procedures specified in Section A.V.1 above.

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
Rotary screen printing and rotogravure printing	OAC rule 3745-31-05	See B.VI.1 below.

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. This permit allows the use of the coatings and cleanup materials specified by the permittee in PTI 16-1601 application for this emissions unit. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the K003, K004, and K005 emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen 3.0 model and a comparison of the predicted 1 hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 14047.6

Pollutant: Toluene

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 4476.2

Pollutant: Cyclohexanone

TLV (mg/m3): 100.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 2380.95

Pollutant: Xylene

TLV (mg/m3): 434.0

Maximum Hourly Emission Rate (lbs/hr): 67.87*

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 426.7

MAGLC (ug/m3): 10,333.33

VI. Miscellaneous Requirements (continued)

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of a modification to the operating permit or the requirement to obtain a new permit to install:

a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;

b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" as defined in OAC rule 3745-77-01(V).

* The maximum hourly rate is the combined VOC allowable mass emission rate from K003, K004, and K005 (emissions for these three emissions units exit the same stack).

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: SILKSCREEN (K006)

Activity Description: SILKSCREEN PRINTING OF SOLVENT BASED INKS.

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
Silk screen printing machine	OAC rule 3745-21-07(G)(2) (PTI 16-1557)	8 lbs/hr of organic compounds (OC) 40 lbs/day of OC Emissions of organic materials to the atmosphere from the cleanup with photochemically reactive materials shall be included with the other emissions of organic materials from this emissions unit for determining compliance with this rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and photochemically reactive cleanup material employed;

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

c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;

d. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

IV. Reporting Requirements

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

a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

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

1.a Emission Limitation:

8 lbs/hr of OC
40 lbs/day of OC

Applicable Compliance Method:

Recordkeeping of coating and photochemically reactive cleanup material usage, OC content of each coating and photochemically reactive cleanup material, and operating hours per day as required by Section A.III.1.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: COMPOUND DEPT. (P002)

Activity Description: MIXES PIGMENTS INTO BASE COMPOUNDS.

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
Compounding room	OAC rule 3745-21-07(G)(2)	See A.I.2.a and A.I.2.b below.
	none (See A.I.2.d below.)	See A.I.2.c below.

2. Additional Terms and Conditions

2.a The permittee shall not discharge more than 8 pounds of organic compounds (OC) in any one hour into the atmosphere, nor more than 40 pounds of OC in any one day, when photochemically reactive materials, as defined under OAC rule 3745-21-07(C)(5), are employed.

2.b Emissions of OC to the atmosphere from the cleanup with photochemically reactive materials shall be included with the other emissions of OC from this emissions unit for determining compliance with this rule.

2.c The emissions of OC from the mixing operation, excluding cleanup emissions, shall not exceed 7.3 tons per year, based upon a rolling, 365-day summation of the daily emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of OC
1	0.61 ton
1-2	1.22 tons
1-3	1.83 tons
1-4	2.43 tons
1-5	3.04 tons
1-6	3.65 tons
1-7	4.26 tons
1-8	4.87 tons
1-9	5.48 tons
1-10	6.08 tons
1-11	6.69 tons
1-12	7.30 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for OC shall be based upon a rolling, 365-day summation of the daily emissions.

2. Additional Terms and Conditions (continued)

2.d The permittee has requested in the Title V permit application to restrict the emissions of OC from the mixing operation, excluding cleanup material, in order to keep the potential to emit of the facility under 250 TPY of VOC.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

a. the company identification for each raw material and cleanup material;

b. documentation of whether a photochemically reactive raw material or cleanup material was employed;

c. the amount of material mixed, in pounds;

d. the organic compound content of each cleanup material, in pounds per gallon;

e. the number of gallons of cleanup material employed;

f. the total organic compound emission rate from the mixing operations, excluding cleanup material (i.e., (c) times 6.9 pounds of OC per 1000 pounds of material mixed) [the OC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", dated May 27, 1998];

g. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 365-day summation of the emissions of OC for the mixing operation, excluding cleanup materials, in tons;

h. for each day during which a photochemically reactive material is employed, the total organic compound emission rate from all photochemically reactive cleanup materials and the mixing operations, in pounds per day;

i. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and

j. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate from all photochemically reactive cleanup materials and the mixing operations, i.e., (h)/(i), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative emissions of OC for each calendar month for the mixing operations, excluding cleanup materials, in tons.

IV. Reporting Requirements

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

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the mixing operations and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the mixing operations and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day emission limitation for OC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

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

V. Testing Requirements

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

1.a Emission Limitation:

8.0 lbs/hr of OC
40.0 lbs/day of OC
7.3 tons of OC per rolling, 365-day summation

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping required in Section A.III.1 and by employing the emission factor of 6.9 pounds of OC per 1000 pounds of material mixed to determine the emissions from the mixing operations. The OC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", dated May 27, 1998.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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