



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

07/30/99

CERTIFIED MAIL

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

02-85-03-0351
Seaman Corporation
Andrew J. Shimko
1000 Venture Blvd.
Wooster, OH 44691

Dear Andrew J. Shimko:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 08/27/98. 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, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northeast District Office
Becky Castle, DAPC PMU



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Date: 07/30/99

PRELIMINARY PROPOSED

Effective Date:

Expiration Date:

This document constitutes issuance to:

Seaman Corporation
1000 Venture Blvd.
Wooster, OH 44691

of a Title V permit for Facility ID: 02-85-03-0351

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

K001 (Fabric Coating Line 3 & associated mixers)

Coating of fabric using hot melt roll coating of thermoplastic polymer compounds, PVC, urethane, and other polymer dry blends.

K002 (Fabric Coating Line 4A & associated mixers)

Knife over roll coater applying a PVC plastisol to fabric and gas oven and rotogravure coating applying top finish to a vinyl coated fabric. 1960 was the original installation date in Millersburg. The source was moved to Wooster in 1987.

K003 (Fabric Coating Line 5 & associated mixers)

Pad roll coating of vinyl primer or knife over roll coating of PVC plastisol to a fabric and gas oven.

K004 (Laminator Line 8 & associated mixers)

Lembo double drum laminator/embosser-coating of fabric polymer films, coated fabrics, and other substrates with adhesive and laminating.

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

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month

period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

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

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

17. Compliance Method Requirements

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

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. Pursuant to the federally enforceable synthetic minor permit to install number 02-6354, the permittee shall not emit more than 249.46 tons of VOC per year and 9595 pounds of VOC per week.
2. The permittee shall collect and record the following information each week for the entire facility:
 - a. The total VOC emissions from all coatings, which is the sum of total VOC emissions from all four coating lines.
 - b. The name and identification of each cleanup material employed.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each cleanup material, in pounds per gallon.
 - e. The total VOC emissions from all coatings and cleanup materials, in pounds.
3. The permittee shall notify the Ohio EPA Northeast District Office in writing of any weekly record showing the total VOC emissions exceeded the allowable limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days following the week of the occurrence.

B. State Only Enforceable Section

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

B001 - 6.2 MMBtu Gas Fired Boiler
Z001 - Tank Farm
Z002 - Maintenance Degreaser
Z003 - Laboratory
Z004 - Solvent Still

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Fabric Coating Line 3 & associated mixers (K001)

Activity Description: Coating of fabric using hot melt roll coating of thermoplastic polymer compounds, PVC, urethane, and other polymer dry blends.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Backside coating of polyester or nylon fabric using hot melt roll coating of urethane dry blend	OAC 3745-21-09(G) PTI No. 02-6354	less stringent than the synthetic minor PTI see A.I.2
	OAC 3745-17-11	0.551 pound particulate emissions per hour from the oven
	OAC 3745-17-07	Visible particulate emissions from the oven shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC 3745-31-05 PTI No. 02-6354	0.34 pound particulate emissions per hour from the mixing room dust collector
		No visible emissions from the mixing room dust collector

2. Additional Terms and Conditions

- 2.a The VOC contents of the coatings (dry blend) employed in this emissions unit shall not exceed 0.015 pound VOC per pound coating compound, as applied, as a weekly mass-weighted average. This is the same as 0.087 pound VOC per gallon dry blend. This will be the only emissions unit in the facility to employ dry blend.
- 2.b The permittee shall not apply more than 800 pounds of coating (dry blend) per hour, as an average for any week.

II. Operational Restrictions

1. Covers shall be used on the mixers in the mixing room when the mixers are used for mixing.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each week for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content, in pounds VOC per pound of coating, of each coating (excluding water and exempt solvents), as applied.
 - c. The number of pounds of each coating applied.
 - d. The total number of pounds of all the coatings applied.
 - e. The total number of hours of operation of fabric coating line 3 (i.e., application of dry blend).
 - f. The average hourly coating usage, in pounds per hour, i.e., d/e.
 - g. The total VOC emissions from all coatings, in pounds.
 - h. The average VOC content of all the dry blend applied (pounds VOC per pound of coating), on a weekly mass-weighted average, as determined by the equation in V.1.a.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any weekly record showing the mass-weighted weekly average VOC content and/or the coating usage exceeded the allowable limits. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days following the week of the occurrence.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.015 pound VOC per pound coating, excluding water and exempt solvents

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and inks. Compliance shall be based on the record keeping as specified in Section A.III. The mass-weighted average VOC content of the coatings shall be determined by the following equation:

$$C_{avg} = \text{summation of } (C_i \times W_i) / \text{summation of } W_i$$

where:

C avg = mass-weighted average VOC content of the coatings.

C_i = the VOC content, in pounds VOC per pound of coating, of each coating.

W_i = the number of pounds of each coating applied.

- 1.b** Emission Limitation:
0.34 lb PM/hr from the mixing room dust collector

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1). Emissions testing shall be conducted if requested by the Ohio EPA Northeast District Office.

- 1.c** Emission Limitation:
no visible emissions from the mixing room dust collector

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1). USEPA Reference Method 22. Testing shall be conducted if requested by the Ohio EPA Northeast District Office.

- 1.d** Emission Limitation:
Visible particulate emissions from the oven shall not exceed twenty percent opacity, as a six-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1). USEPA Reference Method 9. Testing shall be conducted if requested by the Ohio EPA Northeast District Office.

- 1.e** Emission Limitation:
0.551 lb PM/hr from the oven

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1). Emissions testing shall be conducted if requested by the Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Fabric Coating Line 4A & associated mixers (K002)

Activity Description: Knife over roll coater applying a PVC plastisol to fabric and gas oven and rotogravure coating applying top finish to a vinyl coated fabric. 1960 was the original installation date in Millersburg. The source was moved to Wooster in 1987.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Knife over roll coater applying a PVC plastisol to fabric and gas oven and rotogravure coating applying top finish to a vinyl coated fabric.	OAC 3745-21-09 (G)	equal to or less stringent than 21-09(B)(6)
	OAC 3745-21-09 (B)(6)	see A.1.2.a below
	OAC 3745-31-05 PTI No. 02-6354 Synthetic minor Permit to Install	see A.1.2.b and c below
	OAC 3745-17-11	Equivalent to or less stringent than OAC 3745-31-05
	OAC 3745-17-07	Equivalent or less stringent than OAC 3745-31-05
	OAC 3745-31-05 PTI No. 02-6354	There shall be no visible emissions from the mixing room dust collector. 0.34 lb PM/hr from the mixing room dust collector

2. Additional Terms and Conditions

- When coating is applied on the coating line, the permittee shall collect and control the VOC emissions from the coating line by a thermal incinerator, such that the overall VOC capture and control efficiency during operation shall be at least 81%.
- The VOC content of the top finish shall not exceed 0.9 lb VOC/ lb coating, as applied, as a weekly mass-weighted average. The permittee shall not apply more than 125 pounds of top finish per hour, as an average for any week. This is the only emissions unit in this facility to employ top finish coating.
- The VOC content of PVC Plastisol shall not exceed 0.018 lb VOC/ lb coating, as applied, as a weekly mass-weighted average. The permittee shall not apply more than 800 pounds of PVC Plastisol per hour, as an average for any week. Emissions units K002 and K003 are the only emissions units in this facility which shall employ PVC Plastisol coating.
- The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation.

2. Additional Terms and Conditions (continued)

- 2.e** The PTE associated with this emissions unit demonstrated that it meets the criteria established for a PTE in method 204. The permittee performed an additional demonstration to show that the PTE could not be compromised, under normal plant conditions, when the emissions unit was in operation (i.e., the air flow through the PTI to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened). Therefore, the permittee will not be required to perform any additional monitoring, record keeping, and reporting to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

- 1.** Covers shall be used on the mixers in the mixing room when the mixers are mixing.
- 2.** This emissions unit shall be totally enclosed such that VOC emissions are captured and contained. Compliance with the following criteria, identified by USEPA Method 204, shall be met by the permittee:
 - a.** Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
 - b.** The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - c.** The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.
 - d.** All access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process.
 - e.** All VOC emissions must be captured and contained for discharge through a control device.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each week for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content, in pounds VOC per pound of coating, of each coating (excluding water and exempt solvents), as applied.
 - c. The number of pounds of each coating applied, and the total number of pounds of all the Top Finish and PVC Plastisol applied.
 - d. The total number of hours of application of top finish in coating line 4A and the total number of hours of application of PVC Plastisol in coating line 4A.
 - e. The average hourly coating usage, in pounds per hour, for both top finish and PVC Plastisol.
 - f. The weekly mass-weighted average VOC content, as determined by the equation in V.1.b, of all the Top Finish applied.
 - g. The weekly mass-weighted average VOC content, as determined by the equation in V.1.b, of all the PVC Plastisol applied.
 - h. The total uncontrolled VOC emissions from all coatings employed in this emissions unit, which is the summation, for all coatings, of $C_i \times W_i$ as determined by the equation in V.1.b.
 - i. The total controlled VOC emissions from all coatings employed in this emissions unit, in pounds per week, which is determined by the following equation:

controlled emissions = uncontrolled emissions \times (1 - CE)

where: CE = overall control efficiency.
 - j. A log or record of operating time for the capture (collection) system, control device, and monitoring equipment.
 - k. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the coating line was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the coating line was in compliance.
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 coating line 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 perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any weekly record showing the weekly mass-weighted average VOC contents and/or the average coating usages exceeded the allowable limits. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days following the week of the occurrence.
2. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the coating line was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.
3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

- 1.a Emission Limitation:
There shall be no visible emissions from the mixing room dust collector

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1). USEPA Reference Method 22. Testing shall be conducted if requested by the Ohio EPA Northeast District Office.

- 1.b Emission Limitation:
0.9 lb VOC/ lb coating for Top Finish and 0.018 lb VOC/ lb coating for PVC Plastisol, excluding water and exempt solvents

Applicable Compliance Method:
OAC rule 3745-21-10(B). USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and inks. Compliance is based on the record keeping of Section A.III. The mass-weighted average VOC content of the coatings shall be determined by the following equation:

$$C_{avg} = \text{summation of } (C_i \times W_i) / \text{summation of } W_i$$

where:

C avg = mass-weighted average VOC content of the coatings.

C_i = the VOC content, in pounds VOC per pound of coating, of each coating.

W_i = the number of pounds of each coating applied.

- 1.c Emission Limitation:
0.34 lb PM/hr from the mixing room dust collector

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1). US E.P.A. Reference Method 9. Emissions testing shall be conducted if requested by the Ohio EPA Northeast District Office.

- 1.d Emission Limitation
81 % VOC control efficiency

Applicable Compliance Method:
OAC rule 3745-21-10 (C).

V. Testing Requirements (continued)

2. 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 approximately 2.5 years after permit issuance and 6 months prior to the expiration of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the required destruction efficiency.
 - c. The following test method(s) shall be employed to demonstrate compliance with the 81 % overall efficiency: Method 24, Method 25 or Method 25(A).
 - 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 Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - 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 or an approved alternative test protocol. 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.
 - g. Not later than 30 days prior to the proposed test date, 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 and date of the test, and the person(s) who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's refusal to accept the results of the emission test.

Personnel from the appropriate Ohio EPA District Office shall be permitted to witness the test, 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 shall be signed by the person(s) responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Knife over roll coater applying a PVC plastisol to fabric and gas oven and rotogravure coating applying top finish to a vinyl coated fabric.		

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: Fabric Coating Line 5 & associated mixers (K003)

Activity Description: Pad roll coating of vinyl primer or knife over roll coating of PVC plastisol to a fabric and gas oven.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pad roll coating of vinyl primer or knife over roll coating of PVC plastisol to a fabric and gas oven	OAC 3745-21-09 (G)	equal to or less stringent than PTI see A.I.2
	OAC 3745-17-11	0.551 pound particulate emissions per hour from the oven
	OAC 3745-17-07	Visible particulate emissions from the oven shall not exceed twenty percent opacity as a six-minute average, except as provided by rule
	OAC 3745-31-05 PTI No. 02-6354	There shall be no visible emissions from the mixing room dust collector 0.34 lb PM/hr from the mixing room dust collector

2. Additional Terms and Conditions

- 2.a The VOC content of the Adhesive shall not exceed 0.03 lb VOC/ lb coating, as applied, as a weekly mass-weighted average. The permittee shall not apply more than total of 700 pounds of Adhesive per hour, as an average for any week. Emissions units K003 and K004 are the only emissions units in this facility which shall employ adhesive.
- 2.b The VOC content of PVC Plastisol shall not exceed 0.018 lb VOC/ lb coating, as applied, as a weekly mass-weighted average. The permittee shall not apply more than total of 800 pounds of PVC Plastisol per hour, as an average for any week. Emissions units K002 and K003 are the only emissions units in this facility which shall employ PVC Plastisol coating.
- 2.c The permittee shall not apply PVC Plastisol and Adhesive in this coating line at the same time.
- 2.d The total number of hours of operation of coating line K003 and K004 combined (i.e., application of PVC Plastisol and Adhesive) shall not exceed 168 hours per week.
- 2.e The regenerative thermal oxidizer shall be used to reduce the visible emissions from the gas oven.

II. Operational Restrictions

1. Covers shall be used on the mixers in the mixing room when the mixers are mixing.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each week for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC contents, in pounds VOC per pound of coating, of each coating (excluding water and exempt solvents), as applied.
 - c. The number of pounds of each coating applied and the total number of pounds of all the PVC Plastisol and Adhesive applied.
 - d. The total number of hours of PVC Plastisol application and the total number of hours of Adhesive application.
 - e. The total number of hours of all the coatings applied on K003 and K004 combined.
 - f. The average hourly coating usage, in pounds per hour, for both PVC Plastisol and Adhesive.
 - g. The total VOC emissions from all coatings employed in this emissions unit, in pounds per week.
 - h. The weekly mass-weighted average VOC content, as determined by the equation in V.1.b, of all the Adhesive applied.
 - i. The weekly mass-weighted average VOC content, as determined by the equation in V.1.b, of all the PVC Plastisol applied.
2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any weekly record showing the weekly mass-weighted average VOC contents, the coating usages, and/or the combined coating hours from K003 and K004 exceeded the allowable limits. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days following the week of the occurrence.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.03 lb VOC/lb coating of the Adhesive, 0.018 lb VOC/lb coating of PVC Plastisol

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and inks. Compliance shall be based on the record keeping as specified in Section A.III. The mass-weighted average VOC content of the coatings shall be determined by the following equation:

$$C_{avg} = \text{summation of } (C_i \times W_i) / \text{summation of } W_i$$

where:

C avg = mass-weighted average VOC content of the coatings.

C_i = The VOC content, in pounds VOC per pound of coating, of each coating.

W_i = The number of pounds of each coating applied.

- 1.b** Emission Limitation:
No visible emissions from the mixing operation dust collector

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1). USEPA Reference Method 22. Testing shall be conducted if requested by the Ohio EPA Northeast District Office.

- 1.c** Emission Limitation:
0.34 lb PM/hr from the mixing room dust collector

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1). USEPA Reference Method 9. Emissions testing shall be conducted if requested by the Ohio EPA Northeast District Office.

- 1.d** Emission Limitation:
Visible particulate emissions from the coating operation and oven shall not exceed twenty percent opacity, as a six-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1). USEPA Reference Method 9. Testing shall be conducted if requested by the Ohio EPA Northeast District Office.

- 1.e** Emission Limitation:
0.551 lb PM/hr from the oven

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1). USEPA Reference Method 9. Emissions testing shall be conducted if requested by the Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pad roll coating of vinyl primer or knife over roll coating of PVC plastisol to a fabric and gas oven.		

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: Laminator Line 8 & associated mixers (K004)

Activity Description: Lembo double drum laminator/embosser-coating of fabric polymer films, coated fabrics, and other substrates with adhesive and laminating.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Lembo double drum laminator/embosser-coating of fabric polymer films, coated fabrics, and other substrates with adhesive and laminating.	OAC 3745-21-09 (G) PTI No. 02-6354	less stringent than PTI see A.I.2
	OAC 3745-17-11	0.551 pound particulate emissions per hour from the oven
	OAC 3745-17-07	Visible particulate emissions from the oven shall not exceed twenty percent opacity, as a six-minute average
	40 CFR 60.740	See section A.III.2 and A.IV.2
	OAC 3745-31-05 PTI No. 02-6354	There shall be no visible emissions from the mixing room dust collectors. 0.34 lb PM/hr from the mixing room dust collectors.

2. Additional Terms and Conditions

- 2.a The VOC content of the coatings (adhesive) shall not exceed 0.03 lb VOC/ lb coating, as applied, as a weekly mass-weighted average. The permittee shall not apply more than total of 700 pounds of adhesive per hour, as an average for any week. Emissions units K003 and K004 are the only emission units in this facility which shall employ PVC Plastisol coating.
- 2.b The total number of hours of operation of coating line K003 and K004 combined (i.e., application of PVC Plastisol and Adhesive) shall not exceed 168 hours per week.

II. Operational Restrictions

1. Covers shall be used on the mixers in the mixing room when the mixers are mixing.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each week for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content, in pounds VOC per pound of coating, of each coating (excluding water and exempt solvents), as applied.
 - c. The number of pounds of each coating applied and the total number of pounds of all coatings applied.
 - d. The total number of hours of all the coating operations in line 8.
 - e. The average hourly coating usage in pounds per hour.
 - f. The total VOC emissions from all coatings, in pounds per week.
 - g. The average VOC content of all the Adhesive applied (pounds VOC per pound of coating), as a weekly mass-weighted average, as determined by the equation in V.1.a.
2. To comply with 40 CFR 60 Subpart VVV, the permittee shall record each quarter the semi-annual estimates of projected VOC use and actual 12-month VOC use.
3. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from each stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall notify Ohio EPA Northeast District Office in writing of any weekly record showing the weekly mass-weighted average VOC content and/or the coating usage exceeded the allowable limits. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days following the week of the occurrence.
2. To comply with Subpart VVV, the permittee shall:
 - a. report the first semi-annual estimate in which projected annual VOC use exceeds 95 Mg/year; and
 - b. report the first 12-month period in which the actual VOC use exceeds 95 Mg/year.

The reports shall be submitted by the 15th day of February, May, August, and November and shall cover the previous calendar quarter (i.e., January-March, April-June, July-September, and October-December).

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

V. Testing Requirements

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

1.a Emission Limitation:
0.03 lb VOC/lb coating of Adhesive

Applicable Compliance Method:
OAC rule 3745-21-10(B). USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and inks. Compliance shall be based on the record keeping as specified in Section A.III. The mass-weighted average VOC content of the coatings shall be determined by the following equation:

$$C_{avg} = \text{summation of } (C_i \times W_i) / \text{summation of } W_i$$

where:

C_{avg} = mass-weighted average VOC content of the coatings.

C_i = the VOC content, in pounds VOC per pound of coating, of each coating.

W_i = the number of pounds of each coating applied.

1.b Emission Limitation:
0.34 lb PM/hr from the mixing room

Applicable Compliance Method:
OAC rule 3745-17-03(B)(10). Emissions testing shall be conducted if requested by the Ohio EPA Northeast District Office.

1.c Emission Limitation:
There shall be no visible emissions from the mixing room dust collector.

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1). USEPA Reference Method 22. Testing shall be conducted if requested by the Ohio EPA Northeast District Office.

1.d Emission Limitation:
Visible particulate emissions from the coating operation and oven shall not exceed twenty percent opacity, as a six-minute average

Applicable Compliance Method:
OAC rule 3745-17-03(B)(1). USEPA Reference Method 9. Testing shall be conducted if requested by the Ohio EPA Northeast District Office.

1.e Emission Limitation:
0.551 lb PE/hr from the oven

Applicable Compliance Method:
OAC rule 3745-17-03(B)(10). Emissions testing shall be conducted if requested by the Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Lembo double drum laminator/embosser-coating of fabric polymer films, coated fabrics, and other substrates with adhesive and laminating.		

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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