



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Craig W. Butler, Director

6/15/2015

Andy Cvitkovich  
 US Gypsum Company  
 Lake Street  
 Gypsum, OH 43433

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0362000078  
 Permit Number: P0118373  
 Permit Type: Administrative Modification  
 County: Ottawa

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA  
Ohio EPA-NWDO; Michigan; Canada



## Response to Comments

Facility ID:	0362000078
Facility Name:	US Gypsum Company
Facility Description:	Gypsum products
Facility Address:	121 South Lake Street Gypsum, OH 43433 Ottawa County
Permit:	P0118373, Permit-To-Install - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Port Clinton News Herald on 05/14/2015. The comment period ended on 06/13/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

**1. Topic: None**

- a. Comment: None
- b. Response: None





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
US Gypsum Company**

Facility ID:	0362000078
Permit Number:	P0118373
Permit Type:	Administrative Modification
Issued:	6/15/2015
Effective:	6/15/2015





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
US Gypsum Company

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**Final Permit-to-Install**  
US Gypsum Company  
**Permit Number:** P0118373  
**Facility ID:** 0362000078  
**Effective Date:**6/15/2015

## Authorization

Facility ID: 0362000078  
Facility Description: Gypsum products  
Application Number(s): A0052581  
Permit Number: P0118373  
Permit Description: Administrative modification to increase allowable CO and VOC emissions from emissions unit P027 - GFP Board Kiln, based on the results of a stack test conducted on August 7, 2014 and to increase the allowable OC emissions from cleanup solvent usage by R007 - GFP Inking Station #1.  
Permit Type: Administrative Modification  
Permit Fee: \$1,450.00  
Issue Date: 6/15/2015  
Effective Date: 6/15/2015

This document constitutes issuance to:

US Gypsum Company  
121 South Lake Street  
Gypsum, OH 43433

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install**  
US Gypsum Company  
**Permit Number:** P0118373  
**Facility ID:** 0362000078  
**Effective Date:**6/15/2015

## Authorization (continued)

Permit Number: P0118373  
Permit Description: Administrative modification to increase allowable CO and VOC emissions from emissions unit P027 - GFP Board Kiln, based on the results of a stack test conducted on August 7, 2014 and to increase the allowable OC emissions from cleanup solvent usage by R007 - GFP Inking Station #1.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P027</b>
Company Equipment ID:	76 MMBtu/hr, 28 Zone Direct Fired Natural Gas Kiln
Superseded Permit Number:	P0105319
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R007</b>
Company Equipment ID:	Inking Station #1
Superseded Permit Number:	P0105319
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
US Gypsum Company  
**Permit Number:** P0118373  
**Facility ID:** 0362000078  
**Effective Date:**6/15/2015

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) 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 re-issuance, or modification.

- 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, 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 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.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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, 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.
- 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:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

- (2) 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 made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. 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.
  - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office 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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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:
  - (1) 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.
  - (2) 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 ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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 Ohio EPA DAPC, Northwest District Office 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:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- 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 state-only required 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 Ohio EPA DAPC, Northwest District Office. 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, 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.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. 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.

**19. 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.



**Final Permit-to-Install**  
US Gypsum Company  
**Permit Number:** P0118373  
**Facility ID:** 0362000078  
**Effective Date:**6/15/2015

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install**  
US Gypsum Company  
**Permit Number:** P0118373  
**Facility ID:** 0362000078  
**Effective Date:**6/15/2015

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



**Final Permit-to-Install**  
US Gypsum Company  
**Permit Number:** P0118373  
**Facility ID:** 0362000078  
**Effective Date:**6/15/2015

## **C. Emissions Unit Terms and Conditions**

**1. P027, 76 MMBtu/hr, 28 Zone Direct-Fired Natural Gas Kiln**

**Operations, Property and/or Equipment Description:**

GFP 28 Zone Kiln

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(2) through d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

a.	OAC rule 3745-31-10 through OAC rule 3745-31-20	<p>The applicant has committed to comply with the following Best Available Control Technology (BACT) Requirements: [See b)(2)a. and b)(2)b.]</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 7.45 lbs/hr and 32.63 tons per rolling, 12-month period for NO<sub>x</sub></p> <p>Carbon monoxide (CO) emissions shall not exceed 33.42 lbs/hr and 146.38 tons per rolling, 12-month period for CO</p> <p>Organic compounds (OC) shall not exceed 36.23 lbs/hr and 158.69 tons per rolling, 12-month period for OC</p> <p>Particulate matter equal to or less than 10 microns in size (PM<sub>10</sub>) shall not exceed 9.94 lbs/hr and 43.54 tons per rolling, 12-month period for PM<sub>10</sub>.</p>
b.	OAC rule 3745-31-05(A)(3)	Sulfur Dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.04 lb/hr, 0.18 ton/year
c.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	See b)(2)c.
e.	OAC rule 3745-18-06(G)	See b)(2)d.

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined to be good combustion practices and the use of natural gas [see c)(1)].
- b. The emission limitations of 7.45 lbs/hr and 32.63 tons per year of NO<sub>x</sub>, 33.42 lbs/hr and 146.38 tons per year of CO, 36.23 lbs/hr and 158.69 tons per year of OC, and 9.94 lbs/hr and 43.54 tons per year of PM<sub>10</sub> were established to reflect the potential to emit for this emissions unit. Therefore, no recordkeeping, deviation reporting or compliance calculations are required to demonstrate compliance with these limitations.
- c. This emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-10 through 31-20.
- d. This emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permit to install for emission unit P027 was evaluated based on stack test results and the design parameters of the emission unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: Formaldehyde

TLV (ug/m3): 272

Maximum Hourly Emission Rate (lb/hour): 1.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.08

MAGLC (ug/m3): 6.47

- (3) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
- (5) The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

33.42 lbs CO/hr, 146.38 tons CO per rolling, 12-month period

Applicable Compliance Method:

The hourly emission limitation was established from the worst case hourly emission rate, based on the recent stack test result averaged over a three one hour runs of 29.06 lbs CO/hr and a 15% safety factor.

Compliance with the tons CO per rolling, 12-month period emission limitation may be demonstrated by multiplying the lbs CO /hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 10.

b. Emission Limitations:

7.45 lbs NO<sub>x</sub>/hr, 32.63 tons NO<sub>x</sub> per rolling, 12-month period

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (million cubic feet/hour) by the emission factor from AP-42 Table 1.4-1 (revised 7/1998) of 100 lb NO<sub>x</sub>/million cubic feet of natural gas.

Compliance with the tons NO<sub>x</sub> per rolling, 12-month period emission limitation may be demonstrated by multiplying the lbs NO<sub>x</sub>/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lbs/hr emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 7.

c. Emission Limitations:

36.23 lbs OC/hr, 158.69 tons OC per rolling, 12-month period

Applicable Compliance Method:

The hourly emission limitation was established from the worst case hourly emission rate, based on the recent stack test result averaged over three one hour runs of 31.5 lbs OC/hr and a 15% safety factor.

Compliance with the tons OC per rolling, 12-month period emission limitation may be demonstrated by multiplying the lbs OC/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with CFR, Part 60, Appendix A, Methods 1 - 4, and 18, 25 or 25A.

- d. Emission Limitations:  
9.94 lbs PM<sub>10</sub>/hr, 43.54 tons PM<sub>10</sub> per rolling, 12-month period

Applicable Compliance Method:

The hourly emission limitation was established from the worst case hourly emission rate, based on the recent stack test result of 8.64 lbs PM<sub>10</sub>/hr and a 15% safety factor.

Compliance with the tons PM<sub>10</sub> per rolling, 12-month period emission limitation may be demonstrated by multiplying the lbs PM<sub>10</sub>/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr PM<sub>10</sub>/dscf by testing in accordance with Methods 201/201A of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- e. Emission Limitations:  
0.04 lb SO<sub>2</sub>/hr, 0.18 ton/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (million cubic feet/hour) by the emission factor from AP-42 Table 1.4-2 (revised 7/1998) of 0.6 lb SO<sub>2</sub>/million cubic feet of natural gas.

Compliance with the annual emission limitation may be demonstrated by multiplying the lb SO<sub>2</sub>/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with CFR, Part 60, Appendix A, Methods 1 - 4, and 6.

- f. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.



**Final Permit-to-Install**  
US Gypsum Company  
**Permit Number:** P0118373  
**Facility ID:** 0362000078  
**Effective Date:**6/15/2015

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) This PTI supersedes the requirements of PTI #P0105139 issued on 08/03/2011 for emissions unit P027.

**2. R007, Inking Station #1**

**Operations, Property and/or Equipment Description:**

GFP Black Inking Station (Z624)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-10 through OAC rule 3745-31-20	The applicant has committed to comply with the following Best Available Control Technology (BACT) Requirements: [See b)(2)a.]  Organic compounds (OC) shall not exceed 27.1 tons per rolling, 12-month period from coatings
b.	OAC rule 3745-31-05(A)(3)	OC emissions shall not exceed 80 lbs/month and 0.5 ton/yr from cleanup materials
b.	OAC rule 3745-21-07(M)	See b)(2)b.

(2) Additional Terms and Conditions

a. Based on the "Prevention of Significant Deterioration" (PSD) analysis conducted to ensure the application of "Best Available Control Technology" (BACT), it has been determined that no control technologies for VOC were cost effective.

b. This emissions unit is not subject to the requirements of this rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for coating usage in this emissions unit:
  - a. The company identification for each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The OC content of each coating employed, in pounds/gallon.
  - d. The OC input rate for each coating employed, in pounds [d)(1)b. x d)(1)c.].
  - e. The total OC input rate for all the coatings employed, in pounds [summation of d)(1)d. for all coatings].
  - f. The annual year to date OC for all the coatings employed, in tons [summation of d)(1)e. for each month to date from January to December].
- (2) The permittee shall collect and record the following information each month for cleanup material\* usage in this emissions unit:
  - a. The company identification for each cleanup material employed.
  - b. The number of gallons of each cleanup material employed.
  - c. The OC content of each cleanup material employed, in pounds/gallon.
  - d. The OC input rate for each cleanup material employed, in pounds [d)(2)b. x d)(2)c.].
  - e. The total OC input rate for all cleanup materials employed, in pounds [summation of d)(2)d. for all cleanup materials].
  - f. The annual year to date OC for all cleanup materials employed in tons [summation of d)(1)e. for each month to date from January to December].

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedances of the 27.1 tons of OC per rolling, 12-month period for coatings;
  - b. any exceedances of the 80 lbs/month for cleanup materials; and
  - c. any exceedance of the 0.5 ton OC/year for cleanup materials.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation(s):  
27.1 tons per rolling 12-month period

Applicable Compliance Method:

The tons OC per rolling, 12-month period limitation was developed by multiplying the maximum OC content of 7.26 lbs OC/gallon by the maximum coating application rate of 7465 gallons/yr and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the annual coating application rate, compliance shall also be demonstrated with the annual limitation.

b. Emission Limitation(s):  
80 lbs OC/month, 0.5 ton OC/yr from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section d)(2) of the terms and conditions of this permit.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.