



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
SUMMIT COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02261

DATE: 1/21/2003

Georgia Pacific Corp
Pearson Devaul
3265 Gilchrist Rd
Mogadore, OH 44260

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

ARAQMD



**Permit To Install
Terms and Conditions**

**Issue Date: 1/21/2003
Effective Date: 1/21/2003**

FINAL PERMIT TO INSTALL 16-02261

Application Number: 16-02261
APS Premise Number: 1677150028
Permit Fee: **\$200**
Name of Facility: Georgia Pacific Corp
Person to Contact: Pearson Devaul
Address: 3265 Gilchrist Rd
Mogadore, OH 44260

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3265 Gilchrist Rd
Mogadore, Ohio**

Description of proposed emissions unit(s):

Crittenden Laminator with glue unit.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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 party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. 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).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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Georgia Pacific Corp
PTI Application: 16-02261
Issued: 1/21/2003

Facility ID: 1677150028

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year (facility)</u>
VOCs	52.0
individual HAPs	9.0
combined HAPs	22.2

9.0 tpy individual HAPs; and
22.2 tpy combined HAPs.

The permittee has existing material usage and emissions records such that there is no need for first year cumulative monthly material usage and emissions limitations.

2. Additional Terms and Conditions

- 2.a** The VOC emissions limitations regulated per OAC rule 3745-31-05(A)(3) are based upon accepted USEPA potential to emit procedures for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with these emissions limits.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increase(s) the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

- 2.b** The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the nine sources in this permit shall not exceed 9.0 tons/year for any single HAP and 22.2 tons/year for any combination of HAPs. VOC emissions for the nine emissions units in this permit are restricted to 52.0 tons/year. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

B. Operational Restrictions

1. The maximum annual VOC material usage* (from inks, coatings, adhesive, and clean up materials) for K001 through K003, K006 through K010, & P001 shall not exceed 52.0 tons, based upon a rolling, 12-month summation of the VOC material usage figures.

*Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate and is based upon the solvent in the materials employed or applied being emitted.

[Note: The permittee has existing material usage records such that there is no need for first year cumulative monthly material usage limitations.]

2. The maximum annual individual HAP material usage** (from inks, coatings, adhesive, and clean up materials) for K001 through K003, K006 through K010, & P001 shall not exceed 9.0 tons, based upon a rolling, 12-month summation of the individual HAP material usage figures.

**Annual individual HAP material usage rate (input) is equivalent to an annual individual HAP emissions rate and is based upon the solvent in the materials employed or applied being emitted.

[Note: The permittee has existing individual HAP individual material usage rate records such that there is no need for first year cumulative monthly individual HAP material usage rates and emissions limitations.]

3. The maximum annual combined HAP material usage rate*** (from inks, coatings, and adhesive, and clean up materials) for K001 through K003, K006 through K010, & P001 shall not exceed 22.2 tons, based upon a rolling, 12-month summation of the combined HAP material usage figures.

***Annual combined HAP material usage rate (input) is equivalent to an annual combined HAP emissions rate and is based upon the solvent in the materials employed or applied being emitted.

[Note: The permittee has existing combined HAP material usage rates and emissions records such that there is no need for first year cumulative monthly combined HAP material usage rates and emissions limitations.]

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for K010:

- a. The name and identification number of each coating, as applied.
- b. The VOC content of each coating (excluding water and exempt solvents), as applied.

USEPA Method 24 shall be used to determine the VOC content of each coating, as applied.

2. The permittee shall collect and record the following information each month for the facility (K001 through K003, K006 through K010, & P001):

- a. the name and identification number of each ink, coating, adhesive, and clean up materials employed;
- b. the weight, in pounds per month, of each ink, as applied;

- c. the weight, in pounds per month, of each coating, as applied;
- d. the weight, in pounds per month, of each adhesive, as applied;
- e. the weight, in pounds per month, of each cleanup material, as applied;
- f. the VOC content of each ink (excluding water and exempt solvents), as applied, in percent by weight;
- g. the VOC content of each coating (excluding water and exempt solvents), as applied, in percent by weight;
- h. the VOC content of each adhesive (excluding water and exempt solvents), as applied, in percent by weight;
- i. the VOC content of each cleanup material (excluding water and exempt solvents), as applied, in percent by weight
- j. the total VOC emissions from all inks, coatings, and adhesives $[(b \times f) + (c \times g) + (d \times h) + (e \times i)]$, in pounds per month;
- k. the HAP content of each individual ink, as applied, in percent by weight;
- l. the HAP content of each individual coating, as applied, in percent by weight;
- m. the HAP content of each individual adhesive, as applied, in percent by weight;
- n. the HAP content of each individual cleanup material, as applied, in percent by weight;
- o. the total individual HAP emissions from all inks, coatings, adhesives, and cleanup materials employed $[(b \times k) + (c \times l) + (d \times m) + (e \times n)]$, in pounds per month;
- p. the sum of each individual HAP content from all inks employed, as applied, in percent by weight;
- q. the sum of each individual HAP content from all coatings employed, as applied, in percent by weight;
- r. the sum of each individual HAP content from all adhesives employed, as applied, in

- percent by weight;
- s. the sum of each individual HAP content from all cleanup materials employed, as applied, in percent by weight;
 - t. the total ink, coating, adhesive, and cleanup material usage, calculated by summing the records from (b), (c), and (d) in pounds per month;
 - u. the rolling, 12-month summation of VOC emissions, from all inks, coatings, adhesives, cleanup materials employed in tons;
 - v. the sum of all the individual combined HAP emissions from all inks, coatings, adhesives, and cleanup materials employed $[(b \times p) + (c \times q) + (d \times r) + (e \times s)]$ (results in all combined HAP emissions), in pounds per month;
 - w. the rolling, 12-month summation of individual HAP emissions, from all inks, coatings, adhesives, cleanup materials employed in tons; and
 - x. the rolling, 12-month summation of combined HAP emissions, from all inks, coatings, adhesives, cleanup materials employed in tons.
3. The permit to install for this emissions unit was evaluated based on the actual process materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: vinyl acetate (CAS 108-05-4)
TLV (ug/m³): 35,000
Maximum Hourly Emission Rate (lbs/hr): 2.37
Predicted 1-Hour Maximum Ground-Level Concentration at 71 m (ug/m³): 250
MAGLC (ug/m³): 833
4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such

Emissions Unit ID: **K010**

parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxics Policy" include the following:

- i. changes in the composition of the materials used (process materials and cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- ii changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- iii physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

D. Reporting Requirements

Issued: 1/21/2003

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the calculated annual restricted allowable facility usage rates for all VOC-emitting & HAP-emitting materials proposed and actually employed using the methodology specified in Section C above, as well as the corrective actions that were taken to achieve compliance.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the facility 52.0 tpy VOCs, 9.0 tpy individual HAPs, and 22.2 tpy combined HAPs limitations (based upon a rolling, 12-month summation of the monthly emissions), as well as the corrective actions that were taken to achieve compliance.
4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.2 of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 2.9 pounds of VOC per gallon of adhesive, excluding water and exempt solvents (K010).

Applicable Compliance Method: The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section C.1 of these terms and conditions.

USEPA Method 24 shall be used to determine the VOC content for adhesives. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular adhesive, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that adhesive to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

- b. Emission Limitations: 2.37 lbs/hr & 10.4 tpy VOCs (K010).

Emissions Unit ID: **K010**

Applicable Compliance Method: The above emissions limitations were established based on the unrestricted potential to emit, as shown in the following equations, using company-specified process data:

H = PGO; and
 Y = HTW

Where,

H = 2.37 lbs/hr of VOCs [unrestricted hourly potential to emit];
 Y = 10.4 tpy VOCs [unrestricted yearly potential to emit];
 P = 22 msf/hr [company-specified rated production capacity];
 G = 14.67 lbs glue/msf [company-specified process factor];
 O = 0.00734 lb VOCs/lb glue [company-specified emission factor];
 T = 8760 hours/year [unrestricted operating schedule]; and
 W = 1 ton/2000 pounds [weight conversion].

- c. Emission Limitations: 52.0 tpy VOCs, based upon a rolling, 12-month summation of the monthly emissions from this facility (K001 through K003, K006 through K010, & P001)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.2 above.

- d. Emission Limitations: 9.0 tpy individual HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (K001 through K003, K006 through K010, & P001)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.2 above.

- e. Emission Limitations: 22.2 tpy combined HAPs, based upon a rolling, 12-month summation of the monthly emissions from this facility (K001 through K003, K006 through K010, & P001)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements of section C.2 above.

F. Miscellaneous Requirements

1. PTI 16-02261 supersedes only the facility-wide requirements (e.g., facility-wide emissions limits, production restrictions, tracking of emissions/production, etc.) of all previous air permits issued, or in the process of being issued, at this facility. PTI 16-02261 does not supersede any emissions

unit requirements of previously issued, or to be issued, air permits.

2. Except for Part II - C.3 through C.5, all terms and conditions of this permit are federally enforceable.