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Facility Name: **Georgia Pacific Corporation**

Application Number: **16-1856**

Date: **November 23, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Georgia Pacific Corporation** located in **Summit** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K007	Crittenden laminator with glue unit	Compliance with Additional Special Terms and Conditions.	3745-31-05	2.37 pounds/hour VOC 10.4 TPY VOC
		Compliance with Ohio EPA "Air Toxics Policy"	3745-21-09 (Y)	*

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	10.4

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

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REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, OH 44308.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, OH 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

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The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The permittee shall not employ any adhesive with a VOC content in excess of 2.9 pounds of VOC per gallon of adhesive, excluding water and exempt solvents.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the number of hours the emissions unit was in operation;
 - b. the VOC content of each coating adhesive, in percent by volume, excluding water, or percent by volume of the volatile matter in each coating;
 - c. the production of the emissions unit in thousand square feet (msf); and,

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- d. the calculated hourly VOC emission rate, in pounds per hour (average).

The VOC emission rate shall be calculated in accordance with the following methodology:

Divide the production for each line, in msf, by the total production for the entire facility for the month, in msf, to obtain a production ratio for the line. Multiply the production ratio for the line by the total VOC emissions for the month to obtain the pounds of VOC per month per line. Divide the result by the hours of operation for the month for the line to obtain the average hourly VOC emission rate for the line.

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C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any monthly record showing the use of noncomplying adhesives unless the daily record shows that the daily volume-weighted average VOC content of all adhesives employed on that day does not exceed the applicable emission limitation. The notification shall include a copy of such record and shall be sent to the Director (Akron Regional Air Quality Management) within 45 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which include any record showing an exceedance of the hourly allowable mass emission rate for OC.
3. 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 Akron Air Pollution Control; and,
 - 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 Akron Air Pollution Control. 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

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with OAC rule 3745-15-06).

D. Testing Requirements

1. Compliance with the emission limitation(s) in Permit to Install 16-1856 shall be determined in accordance with the following method(s):

- a. Emission Limitation

2.37 lbs/hr VOC
10.4 TPY VOC

Applicable Compliance Method

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of section B.1 of these T&Cs.

USEPA Methods 24 and 24A shall be used to determine the VOC content for adhesives, and related coatings, respectively. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, a permittee determines that Method 24 or 24A cannot be used for a particular 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 or 24A. Formulation data shall be used to determine the VOC content of each cleanup material.

E. Miscellaneous Requirements

1. This permit allows the use of the adhesives specified by the permittee in the application for PTI number 16-1856. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the vinyl acetate emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application.

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Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: vinyl acetate

TLV (ug/m3): 35

Maximum Hourly Emission Rate (lbs/hr): 2.37

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 250

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**Maximum Acceptable Ground-Level Concentration (MAGLC)
(ug/m3): 833**

2. As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the Akron Air Pollution Control:
 - a. any changes in the composition of the coatings and cleanup materials, or the use of new coatings and cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
 - c. any change in the composition of the coatings and cleanup materials, or use of new coatings and cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
 - d. any change in the composition of the coatings and cleanup materials, or use of new coatings and cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).
3. For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.