



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: FINAL PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL  
PICKAWAY COUNTY  
Application No: 01-06354**

**DATE:** 1/24/2002

Georgia Pacific Corporation  
Garry Griffith  
951 County Street  
Milan, MI 48160

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 1/24/2002  
Effective Date: 1/24/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-06354

Application Number: **01-06354**  
APS Premise Number: **0165010029**  
Permit Fee: **\$700**  
Name of Facility: **Georgia Pacific Corporation**  
Person to Contact: **Garry Griffith**  
Address: **951 County Street  
Milan, MI 48160**

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2850 Owens Way  
Circleville, OHIO**

Description of modification:  
**7 box printing/coating presses.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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**Modification Issued: 1/24/2002**

Facility ID: **0165010029**

## **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 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**

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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.

### **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 AND OPERATION AFTER COMPLETION OF CONSTRUCTION**

If 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

### **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 &amp; 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 **PICKAWAY** 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</u>	<u>Press #</u>	<u>BAT Determination</u>
P002	P007	Press #1	Compliance with permitted limits and compliance with Ohio Administrative Code
	P008	Press #7	
P003		Press #2	Compliance with permitted limits and compliance with Ohio Administrative Code
P004		Press #3	Compliance with permitted limits and compliance with Ohio Administrative Code
P005		Press #4	Compliance with permitted limits and compliance with Ohio Administrative Code
P006		Press #5	Compliance with permitted limits and

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<u>EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
Ohio Administrative Code	Applicable Federal & OAC Rules	3745-31-05 3745-21-09 (Y)(1)(a)	Permit Allowable Mass Emissions and/or Control/Usage Requirements	1.17 lbs VOC/hr 2.57 TPY VOC <.1 lb HAP/hr 0.14 TPY HAP
Compliance with permitted limits and	3745-31-05 3745-21-09 (Y)(1)(a)		0.95 lb VOC/hr 2.07 TPY VOC <.1 lb HAP/hr 0.4 TPY HAP	
Compliance with Ohio Administrative Code	3745-31-05 3745-21-09 (Y)(1)(a)		1.59 lbs VOC/hr 3.47 TPY VOC 0.15 lb HAP/hr 0.67 TPY HAP	
Compliance with permitted limits and	3745-31-05 3745-21-09 (Y)(1)(a)		1.59 lbs VOC/hr 3.47 TPY VOC 0.15 lb HAP/hr 0.67 TPY HAP	
Compliance with permitted limits and	3745-31-05 3745-21-09 (Y)(1)(a)		1.44 lbs VOC/hr 3.15 TPY VOC 0.14 lb HAP/hr 0.61 TPY HAP	
Ohio Administrative Code	3745-31-05 3745-21-09 (Y)(1)(a)		1.43 lbs VOC/hr 3.13 TPY VOC 0.17 lb HAP/hr <.1 TPY HAP	
	3745-31-05 3745-21-09 (Y)(1)(a)		1.39 lbs VOC/hr 3.05 TPY VOC 0.16 lb HAP/hr 0.04 TPY HAP	

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Ohio EPA Source <u>Number</u>	Source Identification <u>Number</u>	BAT <u>Determination</u>	Applicable Federal & <u>OAC Rules</u>	Permit Allowable Mass Emissions and/or Control/Usage <u>Requirements</u>
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**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
OC	20.91
HAP	2.63

**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.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Central District Office - DAPC, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

**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 OEPA Central District Office - DAPC, 3232 Alum Creek Drive, Columbus, Ohio 43207-3417.

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**

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

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

1. The permittee shall notify the Director of any monthly record showing the use of noncomplying coatings. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall collect and record the following information each month:
  - A. The name and identification number of each ink, coating and cleanup material, as applied;
  - B. The VOC content of each ink, coating and cleanup material, as applied, in pounds per gallon or percentage by weight;
  - C. The number of gallons or pounds of each ink, coating and cleanup material, as applied;
  - D. The VOC content in percentage VOC by volume of each ink and coating, excluding water and exempt solvents, or the VOC content percentage by volume of the volatile matter in each ink and coating; and,
  - E. The total VOC emissions from all inks, coatings and cleanup materials employed, in pounds or tons per month.
3. The permittee shall collect and record the following information each month for emissions units P002, P003, P004, P005, P006, P007 and P008:
  - A. The total number of hours each emissions unit was in operation;
  - B. The total production of each emissions unit in thousand square feet (msf) or tons; and,
  - C. The calculated hourly VOC emission rate, in pounds per hour (average).

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The VOC emission rate shall be calculated with the following methodology in accordance with OAC rule 3745-21-09(B)(3)(f):

Divide the production for each line, in msf or tons, by the total production for the entire facility for the month, in msf or tons, to obtain a production ratio for the line. Multiply the production ratio for the line by the total VOC emissions for the month (from 2) to obtain the pounds of VOC per month per line. Divide the result by the hours of operation for the month to obtain the average hourly VOC emission rate for the line.

4. In order to maintain the de minimis exemptions for the Starch Silo, requested in Georgia Pacific's letter of May 9, 1996, Georgia Pacific shall maintain records, as specified in Ohio Administrative Code (OAC) 3745-15-05(E). Emission levels recorded shall be for particulate matter.

In order to verify that actual emissions from the source described above complied with the requirements of divisions (A) and (C) of section 3704.011 of the Revised Code during its operations, Georgia Pacific, the operator of the source, shall maintain records that show that emissions of any air contaminant from the source did not exceed ten pounds per day on each day the source emitted air contaminants, and that the source in any one year did not emit more than one ton of hazardous air pollutants as defined in division (1) of section 3704.03 of the Revised Code, and that the emissions from the source, in combination with similar air contaminant sources at the same facility, did not result in potential emissions of any air contaminant from the facility in excess of twenty-five tons during the preceding calendar year. All the following information, if applicable, shall be adequate to make that demonstration:

- A. A narrative description of how the emissions from the source were determined and maintained at or below the daily exemption level, and, for emissions of hazardous air pollutants, at or below the annual exemption level;
- B. A description of the air pollution control equipment used on the source and a statement that the source is not capable of operating without that pollution control equipment functioning;
- C. If air pollution control equipment is used, a copy of any report of the results of any emission test that was conducted following Ohio EPA approved methods, if applicable, or any other emission evaluation;
- D. A description of all production constraints required for the source to comply with the exemption

levels;

- E. Records of actual operations that demonstrate that the daily and annual emissions from the source were maintained at or below the exemption level by the use of the necessary production constraints or pollution control equipment;
  - F. A list of all similar sources at the same facility and a statement for each such source of the annual potential emissions. Compliance with paragraph (C)(4) of OAC rule 3745-15-05 shall be demonstrated; and,
  - G. A summation of the total emissions from each exempt or similar source, a summation of stated potential emissions from all sources identified in paragraph (E)(6) of OAC rule 3745-15-05, and a certification under oath that the applicable exemption levels were complied with.
5. Records developed under special term and condition (3) shall be maintained by the owner of the source at a location at the facility for a period of two years following the recording of the information, and shall be provided to the Director upon his request or upon the request of his authorized representative.