



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

8/3/2011

Certified Mail

Andy Cvitkovich
US Gypsum Company
Lake Street
Gypsum, OH 43433

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0362000078
Permit Number: P0105319
Permit Type: Initial Installation
County: Ottawa

Dear Permit Holder:

Enclosed please find a final 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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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
309 South Fourth Street, Room 222
Columbus, OH 43215

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. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

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



Response to Comments

Response to comments for: Permit-To-Install

Table with 2 columns: Field Name, Value. Rows include Facility ID, Facility Name, Facility Description, Facility Address, Permit #, and public notice details.

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.

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: USG comments letter is attached.
a. Comment: 1
b. Response: GFP flood coater is emissions unit R006 in the permit strategy write-up.
c. Comment: 2
d. Response: The VOC limits established in the permit based on AP-42 factors for VOC and not TOC; no permit changes.
e. Comments: 3, 5, 6
f. Response; The 5 % opacity limit was established based on the use of a baghouse; no permit changes.
g. Comment: 4
h. Response: As a rule of thumb, the largest safe factor that we can apply to stack test result is 15%; no permit changes.
i. Comments: 7, 8
j. Response: These natural gas fired dryers are not controlled, however, BACT and BAT rules prompt the establishment of an opacity limit; no permit changes.
k. Comment: 9
l. Response: The VOC limit for R006 will be changed to 2.19 tons per rolling, 12-month period.



RECEIVED

JUL 11 2011

OHIO E.P.A.
N.W. CORNER

United States Gypsum Company
P. O. BOX 121
Gypsum, OH 43433-0121
419 734-3161
Fax: 419 732-2890

Founded in 1902

July 8, 2011

Mr. Jay Liebrecht
Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Dear Mr. Liebrecht:

United States Gypsum Company ("USG") has reviewed the draft Permit To Install ("PTI") P0105319 issued for the Gypsum Fiber Product Operation. USG has the following comments and concerns on the draft PTI:

USG Comment #1: On the "Permit Strategy Write-Up" (pdf pg 5 of 74), under #2, GFP flood coater should be labeled as emission unit "R006". It is listed as emission unit "R008" in the draft PTI. *OK*

USG Comment #2: B008, 125 MMBtu/hr Natural Gas Fired Boiler (PTI pg 15 of 61); P031, 3 MMBtu/hr Input Natural Gas Fired Dryer - GFP (PTI pg 46 of 61); P032, 6 MMBtu/hr Input Natural Gas Fired Dryer - GFP (PTI pg 50 of 61). Organic Compound (OC) limits are reflective of Volatile Organic Compound (VOC) limits applied for in the GFP PTI Permit Application (emission factors were based on AP-42 Table 1.4-2). AP-42 has a Total Organic Compounds (TOC) emission factor for natural gas combustion which is double the VOC factor. USG would like to clarify that this is a VOC limit and not a TOC limit for the purposes of compliance. If the limit is intended to be in terms of Total Organic Compounds, we would like to request that the AP-42 factor which was used in order to calculate the limit be updated accordingly.

USG Comment #3: P026, Finishing Operations: Sanders, Brushes, Saws - GFP (PTI pg 28 of 61). The visible particulate emissions (PE) limit for this emissions unit has been reduced from 20% opacity to 5% opacity. USG requests Ohio EPA's reasoning for this considerable decrease in visible PE.

USG Comment #4: P027, 76 MMBtu/hr, 28 Zone Direct Fired Natural Gas Kiln (PTI pg 35 of 61). The CO and VOC limits which were requested for the GFP Kiln in USG's permit application were based on a stack test result and a 20% safety factor. It appears as though Ohio EPA has reduced this safety factor from 20% to 15%. USG requests Ohio EPA's reasoning for this decrease.

● Page 2

July 8, 2011

USG Comment #5: P029, Stucco Conveying, Grinding & Storage Operations - GFP (PTI pg 39 of 61). The visible particulate emissions (PE) limit for this emissions unit has been reduced from 20% opacity to 5% opacity. USG requests Ohio EPA's reasoning for this considerable decrease in visible PE.

USG Comment #6: P030, Fine Landplaster Conveying & Storage Operations - GFP (PTI pg 42 of 61). The visible particulate emissions (PE) limit for this emissions unit has been reduced from 20% opacity to 5% opacity. USG requests Ohio EPA's reasoning for this considerable decrease in visible PE.

USG Comment #7: P031, 3 MMBtu/hr Input Natural Gas Fired Dryer - GFP (PTI pg 46 of 61). The visible particulate emissions (PE) limit for this emissions unit has been set at 10%. The current Title V permit does not contain a visible PE limit for this emissions unit. USG requests Ohio EPA's reasoning for adding a 10% visible PE limit as a part of this PTI.

USG Comment #8: P032, 6 MMBtu/hr Input Natural Gas Fired Dryer - GFP (PTI pg 50 of 61). The visible particulate emissions (PE) limit for this emissions unit has been set at 10%. The current Title V permit does not contain a visible PE limit for this emissions unit. USG requests Ohio EPA's reasoning for adding a 10% visible PE limit as a part of this PTI.

USG Comment #9: R006, GFP Flood Coater (PTI pg 57 of 61). Based on the maximum VOC content of the coating which is used and the coating application rate, the annual VOC limitation should be 2.19 tons per rolling, 12-month period for OC from coatings. *OK*
The draft PTI lists this VOC limitation as 2.09 tons per rolling, 12-month period for OC from coatings.

If you have any questions or need anything further, please do not hesitate to call at (419) 732-4262.

Sincerely,



Andrew Cvitkovich
Engineering Manager



FINAL

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

Facility ID:	0362000078
Permit Number:	P0105319
Permit Type:	Initial Installation
Issued:	8/3/2011
Effective:	8/3/2011



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

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Authorization

Facility ID: 0362000078
Facility Description: Gypsum products
Application Number(s): A0038067
Permit Number: P0105319
Permit Description: Initial permitting of emissions units R006 and R007. Permit action includes an administrative modification of the remaining emissions units to meet the requirements of the NSR PSD permit.
Permit Type: Initial Installation
Permit Fee: \$4,500.00
Issue Date: 8/3/2011
Effective Date: 8/3/2011

This document constitutes issuance to:

US Gypsum Company
Lake Street
Gypsum, OH 43433

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

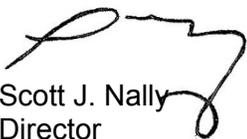
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0105319

Permit Description: Initial permitting of emissions units R006 and R007. Permit action includes an administrative modification of the remaining emissions units to meet the requirements of the NSR PSD permit.

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

- Emissions Unit ID: B008
Company Equipment ID: 125 MMBtu/hr Natural Gas Fired Boiler
Superseded Permit Number: 03-11030
General Permit Category and Type: Not Applicable
Emissions Unit ID: F004
Company Equipment ID: Synthetic Gypsum Unloading, Storage & Conveying
Superseded Permit Number: 03-1030
General Permit Category and Type: Not Applicable
Emissions Unit ID: P026
Company Equipment ID: Finishing Operations: Sanders, Brushes, Saws - GFP
Superseded Permit Number: 03-1030
General Permit Category and Type: Not Applicable
Emissions Unit ID: P027
Company Equipment ID: 76 MMBtu/hr, 28 Zone Direct Fired Natural Gas Kiln
Superseded Permit Number: 03-1030
General Permit Category and Type: Not Applicable
Emissions Unit ID: P029
Company Equipment ID: Stucco Conveying, Grinding & Storage Operations - GFP
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: P030
Company Equipment ID: Fine Landplaster Conveying & Storage Operations - GFP
Superseded Permit Number:
General Permit Category and Type: Not Applicable
Emissions Unit ID: P031
Company Equipment ID: 3 MMBtu/hr Input Natural Gas Fired Dryer - GFP
Superseded Permit Number: 03-1030
General Permit Category and Type: Not Applicable
Emissions Unit ID: P032
Company Equipment ID: 6 MMBtu/hr Input Natural Gas Fired Dryer - GFP
Superseded Permit Number: 03-1030
General Permit Category and Type: Not Applicable
Emissions Unit ID: R004
Company Equipment ID: Double Sided Spray Booth #2 - GFP
Superseded Permit Number: 03-1030
General Permit Category and Type: Not Applicable
Emissions Unit ID: R006
Company Equipment ID: GFP Flood Coater
Superseded Permit Number:

General Permit Category and Type: Not Applicable

Emissions Unit ID: **R007**

Company Equipment ID: Inking Station #1

Superseded Permit Number:

General Permit Category and Type: Not Applicable

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) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and 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 (i.e., postmarked) 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) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) 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.

- c) 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.
- d) 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 (i.e., postmarked) 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).

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 party 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 Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying 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.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- 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 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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online 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 (i.e., postmarked), 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.

B. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions



1. B008, 125 MMBtu/hr Natural Gas Fired Boiler

Operations, Property and/or Equipment Description:

125 mmBTU/hr natural gas fired boiler

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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	<p>The applicant has committed to comply with the following Best Available Control Technology (BACT) Requirements: [See b)(2)a.]</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed: 0.06 lb/mmBtu heat input (for heat input rates >37.5 mmBtu/hr) and</p> <p>0.15 lb NO_x /mmBtu heat input (for heat input rates <37.5 mmBtu/hr)</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 7.5 lb/hr, and</p> <p>32.85 tons per rolling, 12-month period for NO_x</p> <p>Carbon monoxide (CO) emissions shall not exceed 9.5 lb/hr, and</p> <p>41.61 tons per rolling, 12-month period for CO</p>
b.	OAC rule 3745-31-05(A)(3)(a)	Organic compounds (OC) shall not exceed 0.67 lb/hr and 2.93 tons/yr



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Particulate matter less than 10 microns (PM10) shall not exceed 0.93 lb/hr and 4.07 tons/yr Sulfur Dioxide (SO2) emissions shall not exceed 0.07 lb/hr and 0.31 tons/yr See b)(2)b.
c.	OAC rule 3745-17-10(B)(1)	0.020 lb PE/mmBtu of actual heat input, [See b)(2)d.]
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
e.	40 CFR 60.44b (a) [NSPS Subpart Db]	See b)(2)e. and b)(2)f. through b)(2)h.
f.	OAC rule 3745-18-06(G)	See b)(2)i.

(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 the use of natural gas [see c)(1)].
- b. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of 'low NO_x burners'. BAT requirements also include compliance with the terms and conditions of this permit.
- c. The emission limitations of 7.5 lb/hr and 32.85 tons per year of NO_x and 9.5 lb/hr and 41.61 tons per year of CO were established to reflect the potential to emit for this emissions unit. Therefore, no record keeping, deviation reporting or compliance calculations are required to demonstrate compliance with these limitations.
- d. The potential to emit for particulate emissions from this emissions unit is less than the allowable emission limitation established pursuant to this rule.
- e. The NO_x emission limitation specified by this rule (high heat release rate) is less stringent than the NO_x limitation established by OAC rule 3745-31-10 through OAC rule 3745-31-20.
- f. The NO_x emission standard of NSPS Subpart Db of 0.20 lb per mmBtu shall apply at all times, including periods of startup, shutdown, or malfunction. Please note that the NSPS limit is less stringent than the limit established under OAC 3745-31-10 through 3745-31-20.
[40 CFR 60.44b(h)]

- g. The permittee shall maintain a written quality assurance/quality control plan for the continuous NO_x monitoring system, designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

- h. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- i. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NO_x monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. The letter(s)/document(s) of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

- (2) The permittee shall operate and maintain equipment to continuously monitor and record NO_x emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous NO_x monitoring system including, but not limited to:

- a. emissions of NO_x in parts per million on an instantaneous (one-minute) basis;
 - b. emissions of NO_x in pounds per million BTU heat input, pounds per hour and in tons per rolling, 12-month period;
 - c. results of quarterly cylinder gas audits;
 - d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
 - e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
 - f. hours of operation of the emissions unit, continuous NO_x monitoring system, and control equipment;
 - g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO_x monitoring system;
 - h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO_x monitoring system; as well as,
 - i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).
- (3) In lieu of installing a continuous emissions monitoring system (CEM) for NO_x, the permittee may elect to install a predictive emission monitoring system (PEMS) for the NO_x emissions. The PEMS shall be required to meet the promulgated requirements of performance specification 16.
- After initial testing to assure the PEMS meets the performance specification 16, ongoing quality assurance/quality control shall include a Relative Accuracy Test Audit (RATA) once every four (or less) calendar quarters. RATA requirements are in addition to any and all PEMS manufacturer-suggested quality assurance/quality control procedures. RATA requirements shall include multi-load, multi-fuel (when applicable) testing. RATA testing shall be completed using the appropriate 40 CFR 60, Appendix A test methods (Methods 7E, 3A and 1-4 as necessary).
- (4) 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.
- e) Reporting Requirements
- (1) The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NO_x values in excess of the hourly emission limitation of 7.5 lbs NO_x/hr and 0.06 lb NO_x/mmBtu (or 0.15 lb NO_x/mmBtu, as

applicable) of actual heat input. These reports shall also contain the total NO_x emissions for the calendar quarter (in tons).

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO_x monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous NO_x and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total NO_x emissions for the calendar quarter (tons);
 - vi. the total operating time (hours) of the emissions unit;
 - vii. the total operating time of the continuous NO_x monitoring system while the emissions unit was in operation;
 - viii. results and dates of quarterly cylinder gas audits;
 - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
 - x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitor out-of-control and the compliant results following any corrective actions;

- xi. the date, time, and duration of any/each malfunction** of the continuous NO_x monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

- (3) 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 emission limitations in b)(1) shall be determined in accordance with the following method(s):

- a. Emission Limitation:
 - 0.06 lb NO_x/mmBtu heat input (>37.5 mmBtu/hr)
 - 0.15 lb NO_x/mmBtu heat input (<37.5 mmBtu/hr)
 - 7.50 lb NO_x/hr, 32.85 tons per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the lb NO_x/mmBtu limitation(s) above through the record keeping requirements specified in d)(1) or d)(2).

The BAT limitation established by PTI #03-11030 was 0.06 lb NO_x/mmBtu. Compliance with the hourly allowable NO_x emission limitation may be determined by multiplying the 0.06 lb NO_x/mmBtu allowable limitation at the higher heat input rate, by the emissions unit's maximum heat input (125 mmBtu/hr).

Provided compliance is shown with the hourly limitation, compliance shall also be demonstrated with the tons NO_x per rolling, 12-month period limitation (this emission limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000).

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

- b. Emission Limitation(s):
0.020 lb PE/mmBtu of actual heat input
0.93 lb PM₁₀/hr, 4.07 tons/yr

Applicable Compliance Method:

Compliance with the hourly allowable PM₁₀ limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas of 7.6 lbs PE/mm cu. ft. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM₁₀/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

Compliance with the lb/mmBtu allowable PE limitation may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu. ft/hour) by the AP-42, Table 1.4-2 (revised 7/98) emission factor for natural gas of 7.6 lbs PE/mm cu. ft, and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/mmBTU PE limitation in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

If required, the permittee shall demonstrate compliance with the lb PM₁₀/hr by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation(s):
9.5 lb CO/hr, 41.61 tons 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 9.5 lb CO /hr. Compliance with the tons CO per rolling, 12-month period emission limitation may be demonstrated by multiplying the lb 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.

- d. Emission Limitation:
0.67 lb OC/hr, 2.93 tons/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 5.5 lb OC /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb 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 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 18, 25, or 25A.

- e. **Emission Limitation:**
0.07 lb SO₂/hr, 0.31 tons/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 0.6 lb SO₂ /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb SO₂/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 6.

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

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 supercedes the requirements of PTI# 03-11030 issued on 12/4/2003 for emissions unit B008.



2. F004, Synthetic Gypsum Unloading, Storage & Conveying

Operations, Property and/or Equipment Description:

Synthetic gypsum unload, store and convey

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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.] Fugitive particulate matter of 10 microns or less (PM10) shall not exceed 1.64 tons per rolling, 12-month period Fugitive particulate emissions (PE) shall not exceed 3.47 tons per rolling, 12-month period Visible fugitive PE shall not exceed 10% opacity, as a six-minute average. [See b)(2)g.] Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)a. through b)(2)f.]
b.	OAC rule 3745-17-07(B)(1)	See b)(2)h.
c.	OAC rule 3745-17-08(B)(1)	See b)(2)i.

(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 reasonably available control measures.
- b. The processes and material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

Excavator Unloader	Front End Loader
GFP Grizzly Screen	Mill Grizzly Feeder
A Belt Conveyor	D Belt Conveyor
B Belt Conveyor	Crusher Discharge Conveyor
C Belt Conveyor	Reclaim Conveyor
Dome Storage	#1 Conveyor
GFP Bin	Mill Rock Box
GFP Clay Feeder	Mill Clay Feeder
Weigh Belt	Dryer Feed Conveyor
Wet Screen	Synthetic Gypsum Storage Pile

The permittee shall employ best available control measures for the above-identified processes and material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee maintains that the inherent moisture content of the materials involved in the screening operation and associated material handling operations will in many instances be at a level which is more than sufficient to comply with applicable requirements. If at any time the inherent moisture content is not sufficient to meet the above applicable requirements, the permittee has committed to perform watering of the screening operation that will result in material with a sufficient moisture content that will minimize or eliminate visible emissions of fugitive dust for the screening operation and subsequent material handling operations.

Nothing in this paragraph shall prohibit the permittee from employing other equally-effective control measures to ensure compliance.

- c. For each material processing and handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measures is unnecessary.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-10 through OAC rule 3745-31-20.

- e. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to perform watering to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
 - f. The above-identified control measure shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure is necessary to ensure compliance with the above-mentioned applicable requirement. Implementation of the control measure shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirement.
 - g. Visible fugitive PE from any conveyance or transfer points associated with the equipment listed in b)(2)a. shall not exceed ten percent opacity as a six-minute average.
 - h. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
 - i. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the fugitive dust operations/sources in b)(2)a and wind erosion from the synthetic gypsum storage pile, in accordance with the following frequencies:

<u>processing /handling operations:</u>	<u>minimum inspection frequency</u>
all	daily
 - (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for particulate emissions. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a for a fugitive dust operation/source that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified event shall be performed as soon as such event(s) has (have) ended, except if the next inspection is within one week.

- (3) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in d)(3)d shall be kept separately for each fugitive dust operation/source listed in b)(2)a, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
- a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. Each instance when a control measure that was to be implemented as a result of an inspection was not implemented.

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 emission limitations in section b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
 - 1.64 tons of fugitive PM10 per rolling, 12-month period
 - 3.47 tons of fugitive PE per rolling, 12-month period

Applicable Compliance Method:

Compliance with these emission limitations were determined by using emission factor equations in AP-42 Section 13.2.4, (revised 11/06), for load-in and load-out operations and the USEPA's Handbook for Dust Control at Hazardous Waste Sites equations for wind erosion. These emission limits were based on a maximum production of 367,500 tons per year, and a maximum storage surface area of 0.918 acres.

Therefore, provided compliance is shown with the requirement to apply best available control measures, compliance with the tons fugitive PM10 and PE per rolling, 12-month period limitations shall also be demonstrated.

- b. Emission Limitation:
Visible fugitive PE shall not exceed 10% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources") as such Appendix existed on July 1, 2002, and the modifications listed in paragraph (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-11030 issued on 12/4/2003 for emissions unit F004.



3. P026, Finishing Operations: Sanders, Brushes, Saws - GFP

Operations, Property and/or Equipment Description:

GFP Finishing - Sanders, Brushes, Saws

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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.] Particulate matter equal to or less than 10 microns in size (PM10) shall not exceed 0.0053 grain per dry standard cubic foot (dscf) 14.94 tons per rolling, 12-month period for PM10 Visible particulate emissions (PE) shall not exceed 5% opacity, as a six-minute average from the baghouse stack. See b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-11(B)(2)	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 the use of a baghouse, which is what the permittee installed.

- b. The emission limitation 14.94 tons per year of PM10 was established to reflect the potential to emit for this emissions unit. Therefore, no record keeping, deviation reporting or compliance calculations are required to demonstrate compliance with these limitations.
 - c. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-10 through OAC rule 3745-31-20.
 - d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-10 through OAC rule 3745-31-20.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
- e) Reporting Requirements
- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the

appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.0053 gr PM10/dscf, 14.94 tons PM10 per rolling, 12-month period

Applicable Compliance Method:

The gr PM10/dscf emission limitation was established from the worst case outlet grain loading, based on the recent stack test result of 0.0050 gr PM10/dscf and a 5 % safety factor. The annual limitation was established by multiplying the maximum baghouse outlet concentration of 0.0053 gr/dscf, the maximum volumetric air flow rate (75,000 acfm) contributed from this emissions unit to the baghouses, and using the following conversion factors in order to covert to tons per year: 1 lb/7000 grains, 60 minutes/hour, 8760 hours/year and 1 ton/2000 lbs. Therefore, provided compliance is demonstrated with the 0.0053 gr PM10/dscf limitation, compliance with the tons PM10 per rolling, 12-month period limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the gr PM10/dscf by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:
Visible PE shall not exceed 5% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources."
Sources."

g) Miscellaneous Requirements

(1) This PTI supercedes the requirements of PTI# 03-11030 issued on 12/4/2003 for emissions unit P026.



4. 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 operations(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. 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	<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_x) emissions shall not exceed 7.45 lb/hr, and</p> <p>32.63 tons per rolling, 12-month period for NO_x</p> <p>Carbon monoxide (CO) emissions shall not exceed 24.2 lb/hr, and</p> <p>106 tons per rolling, 12-month period for CO</p> <p>Organic compounds (OC) shall not exceed 13.91 lb/hr, and</p> <p>60.93 tons per rolling, 12-month period for OC</p> <p>Particulate matter equal to or less than 10 microns in size (PM₁₀) shall not exceed 9.5 lb/hr, and</p> <p>41.61 tons per rolling, 12-month period for PM₁₀.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)	Sulfur Dioxide (SO ₂) emissions shall not exceed 0.04 lb/hr, 0.18 ton/year
c.	OAC rule 3745-17-07(A)	Visible 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 lb/hr and 32.63 tons per year of NO_x, 24.2 lb/hr and 106 tons per year of CO, 13.91 lb/hr and 60.93 tons per year of OC, and 9.5 lb/hr and 41.61 tons per year of PM₁₀ were established to reflect the potential to emit for this emissions unit. Therefore, no record keeping, deviation reporting or compliance calculations are required to demonstrate compliance with these limitations.
- c. This emissions limit specified by this rule is less stringent that 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 that the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).

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 emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation:
24.2 lb CO/hr, 106 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 of 21.0 lb 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 lb 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 Limitation:
7.45 lb NOx/hr, 32.63 tons NOx 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 (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 100 lb NOx /mm cu. ft. of natural gas. Compliance with the tons NOx per rolling, 12-month period I emission limitation may be demonstrated by multiplying the lb SO2/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 7.

- c. Emission Limitation:
13.91 lb OC/hr, 60.93 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 of 12.10 lb 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 lb 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 Limitation:
9.5 lb PM10/hr, 41.61 tons PM10 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 lb PM10/hr and a 10% safety factor. Compliance with the tons PM10 per rolling, 12-month period emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the gr PM10/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 Limitation:
0.04 lb SO₂/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 (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 0.6 lb SO₂ /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb SO₂/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.



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 supercedes the requirements of PTI# 03-11030 issued on 12/4/2003 for emissions unit P027.



5. P029, Stucco Conveying, Grinding & Storage Operations - GFP

Operations, Property and/or Equipment Description:

GFP - Stucco Conveying, Grinding, and Storage

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-10 through OAC rule 3745-31-20. Row b: OAC rule 3745-17-07(A). Row c: OAC rule 3745-17-11(B)(2).

(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 the use of a baghouse, which is what the permittee installed.

b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-10 through OAC rule 3745-31-20.

- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-10 through OAC rule 3745-31-20.
- c) Operational Restrictions
 - a. None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
- e) Reporting Requirements
 - (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- f) Testing Requirements
 - (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.02 gr PM10/dscf, 0.75 ton PM10 per rolling, 12-month period

Applicable Compliance Method:

The 0.02 gr PM10/dscf emission limitation was established in accordance with the maximum outlet grain loading concentration for the baghouse. The annual limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, the maximum volumetric air flow rate (1,000 acfm) contributed from this emissions unit to the baghouse, and using the following conversion factors in order to convert to tons per year: 1 lb/7000 grains, 60 minutes/hour, 8760 hours/year, and 1 ton/2000 lbs. Therefore, provided compliance is demonstrated with the 0.02 gr PM10/dscf limitation compliance with the tons PM10 per rolling, 12-month period limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly limit by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:
Visible PE shall not exceed 5% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources."

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-10712 issued on 12/18/1997 for emissions unit P029.



6. P030, Fine Landplaster Conveying & Storage Operations - GFP

Operations, Property and/or Equipment Description:

Landplaster Conveying and Storage

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-10 through OAC rule 3745-31-20. Row b: OAC rule 3745-17-07(A). Row c: OAC rule 3745-17-11(B)(2).

(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 the use of a baghouse, which is what the permittee installed.

b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-10 through OAC rule 3745-31-20.

- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-10 through OAC rule 3745-31-20.
- c) Operational Restrictions
 - a. None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
- e) Reporting Requirements
 - (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- f) Testing Requirements
 - (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.02 gr PM10/dscf, 0.47 ton PM10 per rolling, 12-month period

Applicable Compliance Method:

The 0.02 gr PM10/dscf emission limitation was established in accordance with the maximum outlet grain loading concentration for the baghouse. The annual limitation was established by multiplying the maximum baghouse outlet concentration of 0.02 gr/dscf, the maximum volumetric air flow rate (625 acfm) contributed from this emissions unit to the baghouse, and using the following conversion factors in order to convert to tons per year: 1 lb/7000 grains, 60 minutes/hour, 8760 hours/year, and 1 ton/2000 lbs. Therefore, provided compliance is demonstrated with the 0.02 gr PM10/dscf limitation compliance with the tons PM10 per rolling, 12-month period limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly limit by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources."
Sources."

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-10712 issued on 12/18/1997 for emissions unit P030.



7. P031, 3 MMBtu/hr Input Natural Gas Fired Dryer - GFP

Operations, Property and/or Equipment Description:

3 mmBTU/hr input dryer (for spray booth No. 3)

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-10 through OAC rule 3745-31-20. Row b: OAC rule 3745-31-05(A)(3)(a).

c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	OAC rule 3745-18-06(E)	See b)(2)e.

(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 the use of natural gas [see c)(1)].
- b. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of natural gas. BAT requirements also include compliance with the terms and conditions of this permit.
- c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Huron County.
- d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- e. This emissions unit has a rated capacity of less than one thousand pounds per our process weight input. Therefore, it is exempt from OAC rule 3745-18-06(E), pursuant to OAC rule 3745-18-06(C).

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.

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 emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.29 lb NO_x/hr, and 1.27 tons of NO_x 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 (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 100 lb NO_x /mm cu. ft. of natural gas. Compliance with the tons NO_x per rolling, 12-month period emission limitation may be demonstrated by multiplying the lb NO_x /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 7.

- b. Emission Limitation(s):
0.02 lb PM₁₀/hr, 0.09 ton/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 7.6 lb PM₁₀/mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM₁₀/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 Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

- c. Emission Limitation(s):
0.25 lb CO /hr, 1.10 tons of CO 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 (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 84 lb CO/mm cu. ft. of natural gas. Compliance with the tons CO per rolling, 12-month period emission limitation may be demonstrated by multiplying the lb 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.

- d. Emission Limitation:
0.02 lb OC/hr, 0.09 tons/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 5.5 lb OC/mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb 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 40 CFR, Part 60, Appendix A, Methods 1 - 4, and 18, 25, or 25A.

e. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources."
Sources."

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-11030 issued on 12/4/2003 for emissions unit P031.



8. P032, 6 MMBtu/hr Input Natural Gas Fired Dryer - GFP

Operations, Property and/or Equipment Description:

6 mmBTU/hr input dryer (for spray booth No. 2)

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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.] Nitrogen oxides (NO _x) emissions shall not exceed 0.59 lb/hr, and 2.58 tons per rolling, 12-month period for NO _x Carbon monoxide (CO) emissions shall not exceed 0.49 lb/hr and 2.15 tons per rolling, 12-month period for CO
b.	OAC rule 3745-31-05(A)(3)(a)	Organic compounds (OC) shall not exceed 0.03 lb/hr and 0.13 ton/yr Particulate matter less than 10 microns (PM10) shall not exceed 0.04 lb/hr and 0.18 ton/yr Visible particulate emissions (PE) shall not exceed 10% opacity, as a six-minute average. See b)(2)b.



Table with 3 columns: Reference, Rule, and Reference. Rows include OAC rule 3745-17-11(B), OAC rule 3745-17-07(A), and OAC rule 3745-18-06(E).

(2) Additional Terms and Conditions

- a. Based on the "Prevention of Significant Deterioration" (PSD) analysis...
b. The "Best Available Technology" (BAT) control requirement...
c. The uncontrolled mass rate of particulate emissions...
d. This emissions unit is exempt from the visible particulate emission limitations...
e. This emissions unit has a rated capacity of less than one thousand pounds per our process weight input.

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.

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 emission limitations in b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.59 lb NO_x/hr, 2.58 tons of NO_x 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 (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 100 lb NO_x /mm cu. ft. of natural gas. Compliance with the tons NO_x per rolling, 12-month period emission limitation may be demonstrated by multiplying the lb NO_x/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 7.

- b. Emission Limitation(s):
0.04 lb PM₁₀/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 (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 7.6 lb PM₁₀ /mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb PM₁₀/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 Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

- c. Emission Limitation(s):
0.49 lb CO/hr, 2.15 tons of CO 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 (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 84 lb CO/mm cu. ft. of natural gas. Compliance with the tons CO per rolling, 12-month period emission limitation may be demonstrated by multiplying the lb 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 CFR, Part 60, Appendix A, Methods 1 - 4, and 10.

- d. Emission Limitation:
0.03 lb OC/hr, 0.13 ton/yr

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum hourly natural gas combustion rate (mm cu. ft./hr) by the emission factor from AP-42 Table 1.4-2 (revised 07/98) of 5.5 lb OC/mm cu. ft. of natural gas. Compliance with the annual emission limitation may be demonstrated by multiplying the lb 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.

- e. Emission Limitation:
Visible PE shall not exceed 10% opacity, as a 6-minute average from the stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources."
Sources."

g) Miscellaneous Requirements

- (1) This PTI supercedes the requirements of PTI# 03-11030 issued on 12/4/2003 for emissions unit P032.



9. R004, Double Sided Spray Booth #2 - GFP

Operations, Property and/or Equipment Description:

Double Sided Spray Booth

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) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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.] Particulate matter less than 10 microns (PM10) shall not exceed 0.59 lb/hr, and 2.58 tons per rolling, 12-month period for PM10 [see b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)d. and b)(2)f.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule. See b)(2)f.
d.	OAC rule 3745-17-11(C)	See b)(2)e., c)(1) and c)(2).
e.	OAC rule 3745-21-07(G)	See b)(2)g.

(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 the use of dry filtration, which is what the permittee installed.

b. The hourly and annual PM10 emission limitations above were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is

not necessary to establish monitoring, recording keeping or reporting requirements to ensure compliance with these limitations.

- c. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.
- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-10 through OAC rule 3745-31-20.
- e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling of particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11, c)(1) and c)(2) of this permit for this emissions unit, shall be federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan (SIP).
- f. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- g. This spray booth does not employ any VOC's in the water based coating and uses water as a clean-up solvent, therefore this rule is not applicable to this emissions unit.

c) Operational Restrictions

- (1) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be

based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service (normal operation) when the emissions unit was in operation. If there were no deviations from the requirements of this permit during the calendar quarter, the report shall so state that no deviations occurred during the reporting period. The quarterly deviation 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 emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation(s):
0.59 lb PM10/hr, 2.58 tons per rolling, 12-month period

Applicable Compliance Method:

The hourly emission limitation was established based on a stack test result of 0.59 lb PM10/hr for a similar source in the USG Corporation. Compliance with the tons PM10 per rolling, 12-month period emission limitation may be demonstrated by multiplying the lb PM10/hr by 8760 hr/yr, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb PM10/hr by testing in accordance with Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

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

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 supercedes the requirements of PTI# 03-13260 issued on 12/1/1999 for emissions unit R004.

10. R006, GFP Flood Coater

Operations, Property and/or Equipment Description:

GFP Flood Coater (Z622)

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 operations(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. 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 0.50 lb/hr from coatings, and 2.09 2.19 tons per rolling, 12-month period for OC from coatings
b.	OAC rule 3745-21-07(G)	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. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(1), d)(1)b. and e)(2).

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: none.

c) Operational Restrictions

- (1) The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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 determination of whether or not the coating is a photochemically reactive material.
 - c. The number of gallons of each coating employed.
 - d. The OC content of each coating employed, in pounds/gallon.
 - e. The OC input rate for each coating employed, in pounds [d)(1)c. x d)(1)d.].
 - f. The total OC input rate for all the coatings employed, in pounds [summation of d)(1)e. for all coatings].
 - g. The annual year to date OC for all the coatings employed, in tons [summation of d)(1)f. for each month to date from January to December].

e) Reporting Requirements

- (1) The permittee shall submit annual reports with identify any exceedance of the annual OC limit, as well as corrective actions that were taken to achieve compliance. If no deviations occurred during the calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (2) The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any noncomplying coating or cleanup material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

f) Testing Requirements

(1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation(s):

0.50 lb OC/hr, ~~2.09~~2.19 tons per rolling, 12-month period

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum OC content of 0.00835 lb OC/gallon by the maximum coating application rate of 60 gallons/hr.

The tons PM10 per rolling, 12-month period limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

If required, the hourly allowable OC emission limitations shall be determined in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A.

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.

11. 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 operations(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. 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 6.19 lb/hr from coatings, and 27.1 tons per rolling, 12-month period for OC from coatings
b.	OAC rule 3745-31-05(A)(3)(a)	OC emissions shall not exceed 8 lbs /month and 0.048 ton/yr from cleanup materials
b.	OAC rule 3745-21-07(G)	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. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-

approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(1), d)(1)b, d)(2)b, and e)(2).

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: none.

c) Operational Restrictions

- (1) The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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 determination of whether or not the coating is a photochemically reactive material.
 - c. The number of gallons of each coating employed.
 - d. The OC content of each coating employed, in pounds/gallon.
 - e. The OC input rate for each coating employed, in pounds [d)(1)c. x d)(1)d.].
 - f. The total OC input rate for all the coatings employed, in pounds [summation of d)(1)e. for all coatings].
 - g. The annual year to date OC for all the coatings employed, in tons [summation of d)(1)f. 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 determination of whether or not the cleanup material is a photochemically reactive material.
 - c. The number of gallons of each cleanup material employed.
 - d. The OC content of each cleanup material employed, in pounds/gallon.

- e. The OC input rate for each cleanup material employed, in pounds [d)(2)c. x d)(2)d.].
- f. The total OC input rate for all cleanup materials employed, in pounds [summation of d)(2)e. for all cleanup materials].
- g. The annual year to date OC for for all cleanup materials employed in tons [summation of d)(1)f. 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 6.19 lbs of OC/hr for coatings; and
 - b. any exceedances of the 27.1 tons of OC per rolling, 12-month period, for coatings;
 - c. any exceedances of the 8 lbs/month for cleanup materials; and
 - d. any exceedance of the 0.048 tons 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.

- (2) The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any noncomplying coating or cleanup material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

f) Testing Requirements

- (1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation(s):
6.19 lb OC/hr, 27.1 tons per rolling 12-month period

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum OC content of 7.2 lb OC/gallon by the maximum coating application rate of 0.86 gallons/hr.

The tons OC per rolling, 12-month period limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be demonstrated with the annual limitation.

If required, the hourly allowable OC emission limitations shall be determined in accordance with Methods 1 - 4, 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation(s):
8 lbs OC/month, 0.048 ton OC/yr; from cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping 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.