



08/03/2026

John Limandri
Georgia Pacific Corrugated LLC
9048 Port Union Rialto Rd
West Chester, OH 45069

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409000859
Permit Number: P0140816
Permit Type: OAC Chapter 3745-31 Modification
County: Butler

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (P110) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search / Ohio Environmental Protection Agency](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Southwest Ohio Air Quality Agency
1701 Patricia McCollum Way
DEPT 56
Cincinnati, OH 45237

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice appears on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices / Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
SWOAQA; Indiana; Kentucky

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [*Weekly Review and Public Notices / Ohio Environmental Protection Agency*](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: [*HClerk@epa.ohio.gov*](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate OAC Chapter 3745-31 Modification

Georgia Pacific Corrugated LLC
9048 PORT UNION-RIALTO RD
West Chester Twp., OH 45069

ID#: P0140816

Date of Action: 08/03/2026

Permit Desc: Chapter 31 Modification to increase allowable VOC emission limit, coating usage and change VOC content limits for coatings and cleanup material.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://ohioepa.commentinput.com> - Search by entering the permit # P0140816 in the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

- ☐ Synthetic Minor Determination
- ☐ Netting Determination

2. Source Description:

This permitting action is a Chapter 31 Modification to increase allowable VOC emission limit, coating usage and change VOC content limits for coatings and cleanup material for emissions units K001 and K003. This emissions increase will limit potential VOC emissions to less than 10 tons per year, retaining the BAT exemption for K001 and K003. Although coating and cleanup usage will be increased, lower VOC content limits will allow compliance with VOC emission limits.

3. Facility Emissions and Attainment Status:

Georgia Pacific is an existing Synthetic Minor facility currently operating under a Federally Enforceable State Operating Permit, and is located in Butler County. Butler County is in attainment for all NAAQS pollutants [ozone-VOC (2015 standard), PM_{2.5}, PM₁₀, CO, NO_x, and SO₂]. (current status since 6/9/2022)

4. Source Emissions:

Synthetic Minor limits for HAPs will be retained at 9.9 TPY single HAP and 24.9 TPY combined HAPs. VOC emission limits are 9.9 TPY for K001 and K003, each.

5. Conclusion:

This facility is an existing Synthetic Minor Facility, and this permit would authorize an increase in allowable VOC emissions, therefore the permit should be issued in Draft.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	19.8
Single HAP	9.9
Combined HAPs	24.9



**Environmental
Protection
Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Georgia Pacific Corrugated LLC**

Facility ID: 1409000859
Permit Number: P0140816
Permit Type: OAC Chapter 3745-31 Modification
Issued: 08/03/2026
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Georgia Pacific Corrugated LLC

Table of Contents

Authorization	6
List of Commonly Used Abbreviations	8
A. Standard Terms and Conditions	9
B. Facility-Wide Terms and Conditions	14
C. Emissions Unit Terms and Conditions	17
1. Emissions Unit Group - Paper Web Rod Coaters: K001, K003	18

Authorization

Facility ID: 1409000859
Application Number(s): A0081954A0081954
Permit Number: P0140816
Permit Description: Chapter 31 Modification to increase allowable VOC emission limit, coating usage and change VOC content limits for coatings and cleanup material.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 08/03/2026
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation
Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page to:

Georgia Pacific Corrugated LLC
9048 PORT UNION-RIALTO RD
West Chester Twp., OH 45069

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

Southwest Ohio Air Quality Agency
1701 Patricia McCollum Way
DEPT 56
Cincinnati, OH 45237
(513)946-7777

The above-named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

Authorization (continued)

Permit Number:P0140816

Permit Description:Chapter 31 Modification to increase allowable VOC emission limit, coating usage and change VOC content limits for coatings and cleanup material.

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

Group Name:Paper Web Rod Coaters

Emissions Unit ID:	K001
Company Equipment ID:	Paper Web Rod Coater
Superseded Permit Number:	P0138165
General Permit Category and Type:	Not Applicable P0138165
Emissions Unit ID:	K003
Company Equipment ID:	Paper Web Rod Coater
Superseded Permit Number:	P0138165
General Permit Category and Type:	Not Applicable P0138165

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. What does this permit-to-install and operate (PTIO) allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- a) PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11 or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- b) Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended once by 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions



Permit Number: P0140816
Facility Name: Georgia Pacific Corrugated LLC
Facility ID: 1409000859
Effective Date: To be entered upon final issuance

1. This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a PTI document, the facility-wide T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a PTO document, the facility-wide T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The total allowable emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units K001 (Paper Web Rod Coater No. 1), K003 (Paper Web Rod Coater No. 3), K005 (Flood Coat Pre-Coater Machine), K006 (Digital Printing Press), K007 (Flood-Coat Post-Coater Machine), K008 (Spot Varnishing Machine #1), K009 (Spot Varnishing Machine #2), P004 (Corrugator with Hogger, Sterling White-line Rewinder, and Floor-sweep in baler room), all de minimis emissions units (as defined in OAC rule 3745-15-05), and other air contaminant sources exempt from the requirement to obtain a PTI or PTIO pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 tons per year (TPY) for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation of the monthly emissions.

The permittee has existing records to demonstrate compliance with these emission limitations upon permit issuance.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:
 - a) The name and identification number of each coating employed.
 - b) The individual HAP* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.
 - c) The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from b)].
 - d) The number of gallons of each coating employed.
 - e) The name and identification number of each cleanup material employed.
 - f) The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
 - g) The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from f)].
 - h) The number of gallons of each cleanup material employed.
 - i) The total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of b) multiplied by d) for all coatings plus the sum of f) multiplied by h) for all cleanup materials, and divided by 2,000 pounds per ton, if the units are in tons].
 - j) The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons [the sum of c) multiplied by d) for all coatings plus the sum of g) multiplied by h) for all cleanup materials, and divided by 2,000 pounds per tons, if the units are in tons].
 - k) The updated rolling, 12-month summation of emissions for each individual HAP emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.

- l) The updated rolling, 12-month summation of emissions for the total combined HAP emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. This information does not have to be kept on a line-by-line basis.

4. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).
5. Emissions Limitations:
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units identified in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in 3.



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Permit Number: P0140816
Facility Name: Georgia Pacific Corrugated LLC
Facility ID: 1409000859
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Paper Web Rod Coaters: K001, K003

EU ID	Operations, Property and/or Equipment Description
K001	Michaelman Coater No. 1
K003	Michaelman Coater No. 3

a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

(1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)e., b)(2)c., d)(2), d)(3), d)(4), e)(5), and e)(6).

(2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under rule 3745-31-05(A)(3) do not apply to the VOC emissions from this source since the PTE is less than 10 TPY taking into account the federally enforceable restrictions in b)(1)b. below.
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V for VOC & HAPs	VOC emissions from each emission unit shall not exceed 9.9 TPY based on a rolling 12-month summation. See b)(2)a., b)(2)b., c)(1) and c)(2). See Section B.2. – B.5.
c.	OAC rule 3745-21-09(F)(1)	The VOC content of any coating used in emissions units K001 and K003 shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.



d.	OAC rule 3745-21-09(F)(2)(b)	See c)(3).
e.	OAC rule 3745-114 and ORC 3704.03(F)(4)(c)	See b)(2)c., d)(2), d)(3), d)(4), e)(5) and e)(6).

(2) Additional Terms and Conditions

- a. The VOC content of the coatings used in emissions units K001 and K003 shall not exceed 0.05 pound of VOC per gallon of coating, including water, based on a monthly volume-weighted average.
- b. The VOC content of the cleanup materials used in emissions units K001 and K003 shall not exceed 2.0 pounds of VOC per gallon.
- c. In order to demonstrate compliance with the "Toxic Air Contaminant Statute" the Director has established, per ORC 3704.03(F)(4)(c), a limit for ammonia which shall not exceed 129.6 pounds per day from emissions units K001 and K003 combined. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application, by the emission rate modeled (to determine the ground level concentration).

5.4 pounds of ammonia/hour x 24 hours/day = 129.6 pounds of ammonia/day.
- d. The Synthetic Minor requirements through OAC rule 3745-31-05(D), to avoid Title V for VOC, also allow the facility to avoid the additional RACT requirements pursuant to OAC rule 3745-21-09(F)(2)a.

c) Operational Restrictions

- (1) The maximum amount of coatings employed in each emission unit shall not exceed 366,250 gallons per year including water based on a rolling, 12-month summation.
- (2) The amount of organic cleanup materials employed in each emission unit shall not exceed 743 gallons per year based on a rolling, 12-month summation.
- (3) Work practice standards for cleaning materials.
 - a. Unless emissions to the atmosphere are controlled by an approved emission control system with an overall control efficiency of at least ninety per cent, any person using an organic solvent for cleanup shall do the following:
 - i. Store all VOC containing cleaning materials and used shop towels in closed containers.
 - ii. Ensure that mixing and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.
 - iii. Minimize spills of VOC-containing cleaning materials.
 - iv. Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
 - v. Minimize VOC emission from cleaning of storage, mixing, and conveying equipment.

d) Monitoring and/or Recordkeeping Requirements



- (1) The permittee shall collect and record the following information each month for emissions units K001 and K003:
 - a. The company identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating employed.
 - c. The number of gallons of each cleanup material employed.
 - d. The VOC content of each coating employed, in pounds per gallon, as applied, including water.
 - e. The VOC content of each cleanup material employed, in pounds per gallon, as applied.
 - f. The VOC content from each coating employed, as applied, in pounds per gallon, excluding water and exempt solvents.
 - g. The VOC emissions from each coating employed, in pounds.
 - h. The VOC emissions from each cleanup material employed, in pounds.
 - i. The total VOC emissions from emissions units K001 and K003, in pounds.
 - j. The updated rolling, 12-month summation of the total VOC emissions from emissions units K001 and K003, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - k. The updated rolling, 12-month summation for usage of all coatings and the updated rolling, 12-month summation for usage of all cleanup materials employed in emissions units K001 and K003, in gallons of each. This shall include the information for the current month and the preceding eleven calendar months.
 - l. The monthly, volume weighted average VOC content of all the coatings employed in emissions units K001 and K003 during the calendar month, in pounds of VOC/gallon, as applied, including water.
- (2) The FEPTIO application for emissions units K001 and K003 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over 1 TPY using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the maximum acceptable ground-level concentration (MAGLC), calculated as described in Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:
 - a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical



Substances and Physical Agents Biological Exposure Indices shall be used, if the chemical is listed; or

- ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
- b. The TLV is divided by 10 to adjust the standard from the working population to the general public.
- c. This standard is adjusted to account for the duration of the exposure or the operating hours of the emissions units, that is, X hours per day and Y days per week, from that of eight hours per day and five days per week.
- d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant (emitted at 1 TPY or more) or *worst-case* scenario:

- i. Toxic Contaminant: Ammonia

TLV (ug/m3): 17,414

Maximum Hourly Emission Rate (lbs./hr): 5.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 409.9

MAGLC (ug/m3): 414.6

The permittee, having demonstrated that emissions of Ammonia, from emissions units K001 and K003, are estimated to be equal to or greater than 80 percent, but less than 100 percent of the MAGLC, shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.



- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
- c. Physical changes to the emissions units or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute, ORC 3704.03(F)*, will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F)*, has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute ORC 3704.03(F)*:
 - a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute, ORC 3704.03(F)*.
 - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F)*, initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
 - d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute, ORC 3704.03(F)*, and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.

e) Reporting Requirements

- (1) All applications, notifications, or reports required *in writing* are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification or report is considered *submitted* on the date the submittal is successful using a valid



electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. All deviations (excursions) of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, record keeping, and/or testing requirements in this permit:
 - i. The rolling, 12-month summation of the material usage limitations outlined in c)(1) and c)(2);
 - ii. The VOC emissions outlined in b)(1)b; and
 - iii. The VOC content restrictions outlined in b)(2)b. and b)(2)c.
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

- (3) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- (5) The permittee shall include any exceedance of the daily limitation on toxic air contaminant emissions or any deviation from a restriction on the process or hours of operation, as established by the director, in order to maintain any toxic air contaminant below its MAGLC in the annual PER. The permittee shall also include in the PER any changes made, during the calendar year, to a parameter or value entered into the dispersion model used to maintain compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. If no changes to the emissions, emissions units or the exhaust stacks have been made, then the report shall include a statement to this effect.
- (6) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.



f) Testing Requirements

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

a. Emissions Limitation

Emissions of VOC from each emission unit shall not exceed 9.9 TPY, including cleanup, based on a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the rolling, 12-month VOC emissions limitation in b)(1)b. shall be determined by the record keeping in d)(1).

The annual VOC emission limitation was calculated using the following equation:

Annual VOC emissions = (366,250 gallons of coating/year x 0.05 lb. of VOC/gallon of coating x ton/2000 lbs.) + (743 gallons of cleanup material/year x 2.0 lbs. of VOC/gallon of cleanup material x ton/ 2000 lbs.) = 9.9 TPY VOC.

b. Emissions Limitation

The VOC content of any coating shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

The VOC content of the cleanup materials shall not exceed 2.0 pounds of VOC per gallon.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(1). Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the inks and coatings.

c. Emissions Limitation

The VOC content of the coatings used in emissions units K001 and K003 shall not exceed 0.05 pound of VOC per gallon of coating, including water, based on a monthly volume-weighted average.

Applicable Compliance Method

Compliance with the monthly volume-weighted average VOC content limitation shall be demonstrated by the recordkeeping in d)(1)k.

g) Miscellaneous Requirements

- (1) None.