



10/27/2026

David Beckley, Jr.
ProVia Dalton Facility
2150 State Route 39
Sugarcreek, OH 44681

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0285072009
Permit Number: P0141444
Permit Type: Initial Installation
County: Wayne

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
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 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 (Ohio EPA) [Weekly Review and Public Notices](#) website. 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: <https://edocpub.epa.ohio.gov/publicportal/edochome.aspx>. The permit can also be commented on and accessed electronically at: <https://ohioepa.commentinput.com>. Search by entering the permit # (P0141444) in the "Search Projects" search box and selecting "Review Document" or "Draft Permit." Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Written (paper) comments must be sent to the following:

Andrea Moore
Permitting Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
8957 Canyon Falls Blvd.
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA [Weekly Review and Public Notices](#) website. You will be notified in writing 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 Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - Via E-Mail Notification
Ohio EPA-NEDO; Canada

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

Draft Air Pollution Permit-to-Install Initial Installation

ProVia Dalton Facility
630 Henry St
Dalton, OH 44618

ID#: P0141444

Date of Action: 10/27/2026

Permit Desc: Permit-to-install for a Polyurethane Foaming Door Line - Slabstock manufacturing including foaming with rigid polyurethane insulation for Sidelites (P006).

The permit can be accessed electronically and comments may be submitted at: <https://ohioepa.commentinput.com> - Search by entering the permit P0141444 in the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

☒ Synthetic Minor Determination

☐ Netting Determination

2. Source Description:

ProVia Dalton Facility (PVDF) is a door manufacturer. The facility is currently permitted to have nine (9) coating operations for metal and plastic parts with dry filters and NG-fired drying ovens (K001 – K009), three (3) wood & plastic working operations with dust control systems (P002, P004, and P005), and a rigid polyurethane foaming door line (P001).

PVDF is proposed in this permit for installation of a new rigid polyurethane foaming door line (P006). The facility is limited in this permit to federally enforceable restrict the facility-wide emissions of VOC, each single HAP and combined total HAPs to avoid being a major source of PSD for VOC and avoid being a major source of HAPs.

3. Facility Emissions and Attainment Status:

PVDF is located in Wayne County, which is designated as “attainment” for CO, NO_x, PE/PM_{2.5}/PM₁₀, lead (Pb), and ozone. This facility is a “Major Source” of VOC emissions for Title V purpose and an “Area Source” for HAP(s) emissions.

4. Source Emissions:

This PTI contains a federally enforceable restriction of facility-wide VOC emissions not to exceed 249.9 TPY, based upon a rolling, 365-day period to avoid being subject to PSD requirements.

The facility-wide HAP emissions are limited by the following federally enforceable restrictions, based upon a rolling, 365-day period:

1. 9.9 TPY of each single HAP emissions; and
2. 24.9 TPY of combined total HAPs emissions.

PVDF is an “Area Source” of HAP emissions under these federally enforceable limitations, and therefore, avoid being subject to MACT, subpart QQQQ - NESHAP for the Surface Coating of Wood Building Products.

The facility is required by this PTI to track emission rates, keep records, and submit reports.

5. Conclusion:

The emission limitations contained in this synthetic minor PTI are adequate to provide federally enforceable limitations to ensure that the facility-wide emissions will not exceed the two hundred fifty (250) TPY of VOC emissions, the threshold for PSD requirements, and not exceed the major source threshold for each single HAP and combined total HAPs emissions.

6. Please provide additional notes or comments as necessary:

PVDF is an area source of HAP(s) and EU P006 produces rigid polyurethane foam, instead of flexible polyurethane foam. This EU does not subject to MACT Subpart III, the NESHAP for flexible polyurethane foam



production (§63.1290 - §63.1309 and associated tables) and GACT Subpart OOOOOO, the NESHAP for flexible polyurethane foam production and fabrication area sources (§63.11414 - §63.11420)

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC _{Facility-wide}	249.9
Each single HAP _{Facility-wide}	9.9
Combined Total HAPs _{Facility-wide}	24.9
OC _{P006}	157.14



**Environmental
Protection
Agency**

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
ProVia Dalton Facility

Facility ID:	0285072009
Permit Number:	P0141444
Permit Type:	Initial Installation
Issued:	10/27/2026
Effective:	To be entered upon final issuance

Division of Air Pollution Control

Permit-to-Install

for

ProVia Dalton Facility

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Authorization

Facility ID: 0285072009
Facility Description:
Application Number(s): A0082670
Permit Number: P0141444
Permit Type: Permit-To-Install
Permit Fee: \$300.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/27/2026
Effective Date: To be entered upon final issuance

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

ProVia Dalton Facility
630 Henry St
Dalton, OH 44618

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

Ohio EPA DAPC, Northeast District Office
8957 Canyon Falls Blvd.
Twinsburg, OH 44087
(330)963-1200

The above-named entity is hereby granted this Permit-to-Install 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 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

John Logue
Director

Authorization (continued)

Permit Number: P0141444

Permit Description: Permit-to-install for a Polyurethane Foaming Door Line - Slabstock manufacturing including foaming with rigid polyurethane insulation for Sidelites (P006).

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

Emissions Unit ID:	P006
Company Equipment ID:	P006 Polyurethane Foaming Steel Door Sidelite
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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 particulate 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. 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), 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) 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, Northeast 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, Northeast District Office. The written reports shall be submitted 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 to the Ohio EPA DAPC, Northeast 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 semiannual 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, Northeast 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

- b) 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.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast 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, Northeast 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, Northeast 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 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) not exempt from the requirement to obtain a permit-to-install.

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 once by twelve months if application is made to the Director within a reasonable time before the termination date and the permittee 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 "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director 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 shut down 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.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- 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 any other 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 months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" 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 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.

2. Facility-Wide Requirements for VOC and HAP Emissions.

- a) Applicable Emissions Limitations and/or Control Requirements

- (1) Facility-wide emissions from permitted, exempt, and “de minimis” EUs shall not exceed the listed limitations:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) [Synthetic Minor to Avoid Being Subject to PSD Requirements and to Avoid Being a Major Source of HAP(s) emissions.]	See B.2.a)(2) and B.2.b)(1).

- (2) The facility-wide emissions, based upon a rolling, 365-day summation of daily emissions, shall not exceed the following:

- a. 249.9 TPY of VOC;
 - b. 9.9 TPY of each single HAP; and
 - c. 24.9 TPY of combined total HAPs.

- b) Operational Restrictions

- (1) To ensure enforceability during the first 365 calendar days following the issuance of this permit, the permittee shall not exceed the following facility-wide emissions of VOC, each single HAP and combined total HAPs emission levels specified in the following table:

Day(s)	Maximum Allowable Cumulative Facility-wide VOC emissions (tons)	Maximum Allowable Cumulative Facility-wide each Single HAP Emissions (tons)	Maximum Allowable Cumulative Facility-wide Combined Total HAPs Emissions (tons)
1	0.685	0.0272	0.0683
1-2	1.370	0.0544	0.1366
1-3	2.055	0.0816	0.2049

Day(s)	Maximum Allowable Cumulative Facility-wide VOC emissions (tons)	Maximum Allowable Cumulative Facility-wide each Single HAP Emissions (tons)	Maximum Allowable Cumulative Facility-wide Combined Total HAPs Emissions (tons)
thereafter	continue to increase by 0.685 ton/day	continue to increase by 0.0272 ton/day	continue to increase by 0.0683 ton/day
1-365	249.9	9.9	24.9

After the first 365 calendar days of operation following the issuance of this permit, compliance with the annual facility-wide emission limitations of VOC, each single HAP, and combined total HAPs shall be based upon a rolling, 365-day summation of VOC, each single HAP, and combined total HAPs emissions facility-wide.

[Authority for term: OAC rule 3745-77-07(A)(1)]

c) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall calculate and maintain the following daily records of the VOC and each single HAP emissions from all coatings and cleanup material applied in EUs K001 – K009:

a. Daily emissions from all coating applied in EUs of K001 – K009, combined:

i. Daily emissions from all coating applied in each EU of K001 – K009:

- (a) The name and identification of each coating employed;
- (b) The volume of each coating employed, defined as “V”, in gallons per day (gal/day);
- (c) The daily VOC emissions from all coating applied:
 - (i) The daily volume-weighted average VOC content of all coatings, as applied, defined as “C_{VOC,2}”, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9); and
 - (ii) The daily VOC emissions from all coatings applied, defined as “VOC_c”, in lb(s)/day, shall be calculated by the following equation:

$$\text{VOC}_c \left(\frac{\text{lb(s)}}{\text{day}} \right) = (\text{C}_{\text{voc}, 2}) \sum_i^n (\text{V})_i$$

where:

i = a specific coating applied during the day; and

n = the total number of coatings applied during the day.

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- (d) the daily emissions of each single HAP from all coating applied:
 - (i) each single HAP content, defined as “C_{HAP}”, in lb(s)/gal, for each coating; and
 - (ii) the daily emissions of each single HAP from all coating applied, defined as HAP_c, in lb(s)/day, shall be calculated by the following equation:

$$\text{HAP}_c \left(\frac{\text{lb(s)}}{\text{day}} \right) = \sum_i^n [(\text{CHAP})(V)]_i$$

- ii. Total daily emissions from all coating applied in EUs of K001 – K009, combined:
 - (a) Total daily VOC emissions, defined as “VOC_d”, in lbs/day, shall be the sum of VOC_c for each EUs of K001 – K009; and
 - (b) Total daily each single HAP emissions, defined as “HAP_d”, in lbs/day, shall be the sum of HAP_c for each EUs of K001 – K009.
- b. Daily emissions from all cleanup materials applied in EUs of K001 – K009, combined:
 - i. The name and identification of each cleanup material employed;
 - ii. The volume of each cleanup material employed, defined as “G”, in gal/day;
 - iii. Daily VOC emissions from all cleanup material employed:
 - (a) The VOC content of each cleanup material, defined as “C_m”, in lb(s)/gal.; and
 - (b) The total VOC emissions from all cleanup materials, defined as “VOC_m”, in lb(s)/day, shall be calculated by the following equation

$$\text{VOC}_m \left(\frac{\text{lb(s)}}{\text{day}} \right) = \sum_j^m [(G)(C_m)]_j$$

where:

j = a specific cleanup material employed during the day; and

m = the total number of cleanup materials employed during the day.

- iv. Daily emissions of each single HAP from all cleanup material applied:
 - (a) Each single HAP content, defined as “C_{MHAP}”, in lb(s)/gal, for each cleanup material; and
 - (b) The daily emissions of each single HAP from all cleanup material applied, defined as HAP_m, in lb(s)/day, shall be calculated by the following equation:

$$\text{HAP}_m \left(\frac{\text{lb(s)}}{\text{day}} \right) = \sum_j^m [(C_{MHAP})(G)]_j$$

- c. The total daily emissions from all coatings and cleanup materials employed in EUs K001 – K009, combined:
 - i. VOC emissions, in lb(s) or tons, by summing daily VOC emissions “VOCd” and “VOCm”; and
 - ii. Each single HAP emissions, in lb(s) or tons, by summing daily each single HAP emissions of “HAPd” and “HAPm”.
- d. The rolling, 365-day summation of daily VOC emissions from all coating and cleanup material applied in EUs of K001 – K009, combined; and
- e. The rolling, 365-day summation of daily each single HAP emissions from all coating and cleanup material applied in EUs of K001 – K009, combined.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall calculate and maintain records of the rolling, 365-day summations of VOC emissions facility-wide as follows:
 - a. Potential emissions from NG combustion of all drying ovens associated with EUs K001 – K009 were estimated to be 0.175 ton of VOC emissions per rolling, 365-day period. The emissions estimates were determined from an emission factor of 5.5 lb(s) VOC per million standard cubic feet (MMscf) of exhaust gas from Table 1.4-2 in AP-42 Chapter 1.4 Natural Gas Combustion (7/1998) multiplied the maximum NG fuel input capacity in MMcf/hr and multiplied by the product of a conversion factor of 1050 Btu/cf.
 - b. VOC emissions from all other operations in the facility, including insignificant EUs, exempt EUs, de minimis EUs, that are not specified in sections B.2.c)(1)d. and B.2.c)(2)a.
 - c. The rolling, 365-day summations of VOC emissions facility-wide, in tons, by summing the VOC emissions outlined in sections B.2.c)(1)d., B.2.c)(2)a., and B.2.c)(2)b.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall calculate and maintain records of the rolling, 365-day summations of the emissions of each single HAP and combined total HAPs facility-wide as follows:
 - a. Emissions of each single HAP from all NG combustion from all drying ovens associated with all coating EUs K001 – K009;
 - b. Emissions of each single HAP from all other operations in the facility, including insignificant EUs, exempt EUs, de minimis EUs, that are not specified in sections B.2.c)(1)e., and B.2.c)(3)a.;
 - c. The rolling, 365-day summations of each single HAP emissions facility-wide, defined as “HAP_{365-day}”, in tons, by summing the emissions of each single HAP outlined in sections B.2.c)(1)e., B.2.c)(3)a., and B.2.c)(3)b.;
 - d. The rolling, 365-day summations of combined total HAPs emissions, defined as “THAP”, in tons, and shall be calculated by the following equation:

$$THAP \left(\frac{\text{tons}}{\text{a rolling 365-day period}} \right) = \sum_1^p (HAP_m)l$$

where:

l = a specific single HAP during the rolling, 365-day period; and

p = the total number of HAPs during the rolling, 365-day period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d) **Reporting Requirements**

- (1) The reports required by this permit shall be submitted in accordance with the reporting requirements specified in Section A, Standard Terms and Conditions.

[Authority for term: OAC rules 3745-15-03(A) and 3745-77-07(C)(1)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. All days during which the facility-wide emissions, based upon a rolling, 365-day summation of daily emissions, exceed the following:
 - i. 249.9 TPY of VOC;
 - ii. 9.9 TPY of each single HAP; and
 - iii. 24.9 TPY of combined total HAPs.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions in Section A of this permit.

[Authority for term: OAC rules 3745-15-03(B)(1)(a), 3745-15-03(C) and 3745-77-07(C)(1)]

e) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section B.2.a) of these T & C shall be determined in accordance with the following methods:

a. Emission Limitation:

Facility-wide VOC emissions shall not exceed 249.9 TPY, based on a rolling, 365-day summation of daily emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section B.2.c)(2).

b. Emission Limitation:

The facility-wide emissions, based upon a rolling, 365-day summation of daily emissions, shall not exceed the following:

- i. 9.9 TPY of each single HAP; and



- ii. 24.9 TPY of combined total HAPs.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in section B.2.c)(3).

[Authority for term: OAC rule 3745-77-07(C)(1)]



**Environmental
Protection
Agency**

Draft Permit-to-Install

ProVia Dalton Facility

Permit Number: P0141444

Facility ID: 0285072009

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. P006, Polyurethane Foaming Steel Door Sidelite

Operations, Property and/or Equipment Description:

Polyurethane Foaming Door Line 2 - Slabstock manufacturing including foaming with rigid polyurethane insulation for Sidelites

- 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 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)	The OC emissions from this EU shall not exceed 13.10 tons per month, averaged over a 12-month rolling period.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled PTE is less than 10 TPY.
c.	ORC 3704.03(F)(4) and OAC rule 3745-114	See d)(2).

- (2) Additional Terms and Conditions

a. None.

- c) Operational Restrictions

(1) None.

- d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a monthly basis for the materials employed in this emissions unit:

- a. the mass of polyurethane (PUR) produced, in pounds, or the volume of PUR produced, in cubic feet;
- b. the total monthly OC emissions, in pounds, calculated in accordance with the equation(s) specified in f)(2); and

- c. the monthly OC emissions, in tons, averaged over a 12-month rolling period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) Modeling to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F)(4)(b), was not necessary because the EU's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than one TPY. OAC Chapter 3745-31 requires a permittee 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 one TPY may require the permittee to apply for and obtain a new PTI.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. The OC emissions from this EU exceed 13.10 tons per month, averaged over a 12-month rolling period.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions in Section A of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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. Emission Limitation

The OC emissions from this EU shall not exceed 13.10 tons per month, averaged over a 12-month rolling period.

Applicable Compliance Method

Compliance may be demonstrated based on the record keeping requirements in section d)(1)c.

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A-4, Methods 1 through 4, and Method 18, 21, 24 or 25 or equivalent alternative method(s), as approved by Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The monthly OC emissions may be determined based upon the following equation(s):
- a. OC emissions from the blowing agent (e.g. hexafluoro-2-butene):

$$OC_B = (EF_W)(M_{PUR}); \text{ or}$$

$$OC_B = (EF_V)(V_{PUR})$$

Where:

OC_B = the OC emissions from the blowing agent, in lbs/month.

EF = the OC emissions factor for blowing agent emissions, as specified in the application A0082670, submitted on 09/22/2026, for this PTI:

- i. EF_W = 0.0589 pound of hexafluoro-2-butene emitted per pound of polyurethane (PUR) produced, or alternatively
- ii. EF_V = 0.0813 pound hexafluoro-2-butene per cubic foot PUR produced,

These emissions factors will need to be re-evaluated should the polyurethane mix formulation change.

M_{PUR} = the mass of PUR produced, recorded as required in d)(1)a., in lbs/month.

V_{PUR} = the volume of PUR produced, recorded as required in d)(1)a, in ft³/month.

- b. OC/VOC emissions, as methylene diphenyl 4,4' diisocyanate (MDI), from the polyurethane process, shall be calculated using the MDI Emissions Estimator v. 3.0 Software, distributed by the "Alliance for Polyurethanes Industry". Emissions are released as fugitive emissions and from process operation. MDI is also listed as HAP.

Emissions are based on a maximum of 8,760 hours of operation per year;

Maximum production capacity = one entry door per minute; and

Maximum of 10.15 lbs of polyurethane produced per door.

- i. MDI Fugitive Emissions, defined as L_f , estimated to be 75.03 lbs/year:

Where:

The building dimension = 389 ft X 105 ft X 27 ft, application A0082670, submitted on 09/22/2026;

Air exchange rate = 4/hr, recommended default values; and

MDI concentration in air = 0.003 ppm, recommended default values.

- ii. MDI Process Emissions, defined as L_p , estimated to be 0.0111 lbs/year:

Where:

Core density = 1.38 lbs/ft³, application A0082670, submitted on 09/22/2026; and

Maximum feedstock used per year = 4,334,840 lbs, A0082670, submitted on 09/22/2026.

These emission estimations will need to be re-evaluated should the polyurethane mix formulation, production capacity, or any other conditions used in the calculation change.



- c. Emissions from urethan system resin (Polyol) are estimated to be minimal, A0082670, submitted on 09/22/2026.
- d. Emissions from polyurethan additives and catalysts are estimated to be minimal, A0082670, submitted on 09/22/2026;
- e. Determination of the total OC emissions:

$$OC_{TOTAL} = OC_B + (L_f + L_p)/12.$$

Where:

OC_{TOTAL} = the total OC emissions from all process operations, in lbs/month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) This is a new EU for which installation commenced after February 18, 2008. In accordance with OAC rule 3745-21-07(A)(5), the requirements of OAC rule 3745-21-07 are not applicable to this EU.

[Authority for term: OAC rule 3745-21-07(A)(5)]

- (2) This facility does not meet the applicability requirements in 40 CFR §63.1290(a) because it is not a major HAP source and this EU produces rigid polyurethane foam. Therefore, this EU is not subject to the requirements of 40 CFR Part 63, Subpart III, the NESHAP for Flexible Polyurethane Foam Production (40 CFR §63.1290 - §63.1309 and associated tables).

[Authority for term: 40 CFR Part 63, Subpart IIII]

- (3) This EU produces rigid polyurethane foam and does not meet the applicability requirements in 40 CFR §63.11414(a). Therefore, this EU is not subject to 40 CFR Part 63, Subpart OOOOOO, the NESHAP for Flexible Polyurethane Foam Production and Fabrication Area Sources (40 CFR §63.11414 – §63.11420 and associated tables).

[Authority for term: 40 CFR Part 63, Subpart OOOOOO]