11/16/2026

Mr. David Worley
West Carrollton Paper LLC
1030 West Alex-Bell Road
West Carrollton, OH 45449

Facility ID: 0857190001
Permit Number: P0139701
County: Montgomery

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and Public Notices website, ***Weekly Review and Public Notices***. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search website here: ***eDocument Search.*** The permit can also be commented on and accessed electronically at: ***https://ohioepa.commentinput.com***. Search by entering the permit # (P0139701) 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:

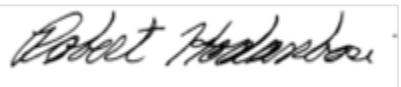
Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Regional Air Pollution Control Agency
117 South Main St.
Dayton, OH 45422-1280

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, ***Weekly Review and Public Notices | Ohio Environmental Protection Agency***. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,



Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - *Via E-Mail Notification*
RAPCA; 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. Phone: 614-644-3037 Email: ***HClerk@epa.ohio.gov***

Draft Title V Permit Renewal

West Carrollton Paper LLC
1030 West Alex-Bell Rd.
West Carrollton, OH 45449

ID#:	P0139701
Date of Action:	11/16/2026
Permit Desc:	Title V renewal for Paper manufacturing (Coated and Laminated) facility.

The permit can be accessed electronically and comments may be submitted at: https://ohioepa.commentinput.com - Search by entering the permit P0139701 in the "Search Projects" search box.

Statement of Basis* For Air Pollution Title V Permit

*As defined in OAC rule 3745-77-01(MM): “Statement of basis” or “SOB” means a statement that sets forth the legal and factual basis for the draft [Title V] permit conditions (including references to the applicable statutory or regulatory provisions).”

Completing this form is intended to satisfy those requirements.

Facility ID:	0857190001
Facility Name:	West Carrollton Paper LLC
Facility Description:	Paper manufacturing - Coated and Laminated
Facility Address:	1030 West Alex-Bell Rd. West Carrollton, OH 45449
Permit #:	P0139701

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☐ Volatile Organic Compounds ☒ Nitrogen Oxides

☐ Particulate Matter ≤ 10 microns ☒ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants ☐ GHG

And/or subject to:

☒ Maximum Available Control Technology Standard(s) ☐ GACT standard(s) that requires a Title V permit ☐ Title IV ☐ Opt-In source

A. Permit Background

1. Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(V)?

Yes X No Comments: None

2. Discuss any **common control determinations** (this includes revisions to previous determinations), include justification, factors, and facts which led to the final decision.

Discussion: None

3. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from **a renewal** per OAC rule 3745-77-08(E). This includes identifying conditions from previous permits that are not included in the new permit.

PTI No.: None	Affected EUs: None

Discussion of changes from the previous Title V:
4. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a **minor modification** per OAC rules 3745-77-08(C)(1) or (2)
PTI No.: None — Affected EUs: None
Minor Modification Description:
5. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a **significant permit modification** per OAC rule 3745-77-08(C)(3)
PTI No.: None — Affected EUs: None
Significant Modification Description:
6. Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a **reopening** per OAC rule 3745-77-08(D)
PTI No.: None — Affected EUs: None
Reopening for Cause for Description:

7. Please identify the affected emissions unit(s) and pollutant(s) for which a **Compliance Assurance Monitoring (CAM)** Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.

Affected EUs: None

8. Please identify any federal **Consent Decree (CD)** that resulted in the addition of Title V T&Cs – include the CD Number, the CD Public Notice date (if known) and Ohio EPA Permit Number (if applicable, along with final permit issuance date) that incorporates the CD requirements.

CD No. None	Public Notice Date:	PTI No. None	PTI Issuance Date: None

9. Please identify any **complex or unusual rule applicability determination** that is not readily apparent in the permit T&Cs and warrants additional explanation in the Statement of Basis. If the discussion is included in a PTI Permit Strategy Write Up cite the Permit Number and copy/paste or summarize the determination here.

PTI No. None Discussion:

10. Please identify any **streamlining determinations** within the permit. Include an identification of the subsumed limit(s) and an explanation of how the resulting limit is equivalent to or more stringent than those subsumed. If the discussion exists in a PTI Permit Strategy Write Up, cite the Permit Number and summarize the determination here. This would also be noted for specific emissions units identified in C.

PTI No. None Discussion:

11. Please identify any current **enforcement actions** to address violations at the facility resulting in a compliance plan and schedule.	
Director's Final Findings and Orders; AGO Consent Decree; or U.S. EPA Consent Decree Date:	List the Order/Injunctive Relief number from the associated enforcement document and provide a description: None

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.		40 CFR Part 63, Subpart A.	MACT General Provisions applicability identified by MACT source category.
B.3.		40 CFR Part 63, Subpart JJJJ.	Emissions Unit is subject to the NESHAP for Paper and Other Web Coating Lines. The applicable section of 40 CFR 63, Subpart JJJJ have been cited in the terms and conditions for emissions unit K002. Compliance is currently demonstrated by not using HAP containing materials.

B.4.		40 CFR Part 63, Subpart DDDDD.	The facility is subject to the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters.
B.5.		Insignificant Emissions Units	List of insignificant emissions units with applicable requirements.
B.6.		40 CFR Part 63, Subpart ZZZZ	Listing of emissions units subject to NESHAP for Reciprocating Internal Combustion Engines
B.7.		40 CFR Part 60, Subpart JJJJ	EU B709 is subject to NSPS for Stationary Spark Ignition Internal Combustion Engines for emergency generators.

C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements?	R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) Misc = miscellaneous requirements

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.1:											
B001	0.020 lbs. Particulate per million Btu	3745-17-10(B)(1)	N	N	Y	Y	Y	N	N	N	ET - Natural Gas is considered an inherently clean fuel, testing wing will be completed upon request.
B001	20 % opacity as a six-minute average, except as provided by rule.	3745-17-07(A)(1)	N	N	N	N	N	N	N	N	M, R, Rp, and ET-Natural Gas is considered an inherently clean fuel, testing wing will be completed upon request.
B001	N/A	3745-18-06(A)	Y	N	N	N	N	N	N	N	Natural gas is the only fuel capable of being fired in this emissions unit; therefore, the SO2 emissions limitations of OAC rule 3745-18 are not applicable to this emissions unit.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
K002	2.9 lbs. VOC/gallon excluding water and exempt solvents.	3745-21-09(F)	N	N	Y	Y	Y	N	N	N	ET- compliance shall be demonstrated through the record keeping and reporting requirements, therefore emissions testing is not necessary.
K002	Nitrogen Oxide (NOx) - 5.0 lbs./hr. and 22.2 tons/year.	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	M, R, Rp, and ET – The hourly emissions limitation is reflective of the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping, reporting, and testing requirements to ensure compliance.
K002	CO - 6.87 lbs./hr. and 30.1 tons/year.	3745-31-05(A)(3)	N	N	N	N	N	N	N	N	M, R, Rp, and ET – The hourly emissions limitation is reflective of the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping, reporting, and testing requirements to ensure compliance.
K002	VOC 35.2 tons per year based	3745-31-05(D)	N	Y	Y	Y	Y	N	N	N	OR – Appropriate monitoring, record keeping, and reporting requirements have been established for the operational restriction.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	upon a rolling 12-month summation.										ET – Compliance shall be demonstrated through the record keeping and reporting requirements, therefore emissions testing is not necessary.

Ohio Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Title V Permit

for

West Carrollton Paper LLC

Facility ID:	0857190001
Permit Number:	P0139701
Permit Type:	Renewal
Issued:	11/16/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
West Carrollton Paper LLC

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Authorization

Facility ID:	0857190001
Facility Description:	Paper manufacturing - Coated and Laminated
Application Number(s):	A0081014
Permit Number:	P0139701
Permit Description:	Title V renewal for Paper manufacturing (Coated and Laminated) facility.
Permit Type:	Renewal
Issue Date:	
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0129732

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

West Carrollton Paper LLC
1030 West Alex-Bell Rd.
West Carrollton, OH 45449

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

Regional Air Pollution Control Agency
117 South Main St.
Dayton, OH 45422-1280
(937)225-4435

The above-named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Regional Air Pollution Control Agency. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

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/m3 = 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/m3 = 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_2S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H_2SO_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/m3 = 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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting for State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30., Submitting Documents Required by this Permit

[Authority for term: ORC 3704.036(A)]

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

[Authority for term: OAC rule 3745-77-07(A)(3)(b)(i)]

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 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.

[Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii)]

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

[(Authority for term: OAC rule 3745-77-07(A)(3)(c)]

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Regional Air Pollution Control Agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation

occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

[(Authority for term: OAC rule 3745-77-07(A)(3)(c)]

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.20, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Regional Air Pollution Control Agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

[(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b)]

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)(v)]

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Regional Air Pollution Control Agency unless otherwise specified.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

3. Reporting of Any Exceedance of a Federally Enforceable Emission Limitation or Control Requirement Resulting from Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

[Authority for term: OAC rule 3745-77-07(A)(3)(c)]

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) A compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) As part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

[Authority for term: OAC rule 3745-77-07(A)(4)]

5. 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.

[Authority for term: OAC rule 3745-77-07(A)(5)]

6. Severability Clause

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.

[Authority for term: OAC rule 3745-77-07(A)(6)]

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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 except as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) The permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) The permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable; or

(3) A combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

[Authority for term: OAC rule 3745-77-01, OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77-07(A)(7)]

8. 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.

[Authority for term: OAC rule 3745-77-07(A)(8)]

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

[Authority for term: OAC rule 3745-77-07(A)(9)]

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

[Authority for term: OAC rule 3745-77-07(A)(10)]

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

[Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D)]

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the state, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under state law only.

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

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.

(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 Regional Air Pollution Control Agency 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Regional Air Pollution Control Agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent consistent with A.13.d)(2)a. above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d)(2)a. above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

[Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L)]

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [defined as "Title I modification" in OAC rule 3745-77-01], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Regional Air Pollution Control Agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days' notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Regional Air Pollution Control Agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

[Authority for term: OAC rules 3745-77-07(H)(1) and (2)]

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as "insignificant activities and emissions levels" as defined in OAC rule 3745-77-01. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph

(I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

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

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

20. Permit-to-Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit-to-install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

21. 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.

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible 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 Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

[Authority for term: OAC rule 3745-77-01]

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

[Authority for term: OAC rule 3745-77-01(H)(11)]

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the Regional Air Pollution Control Agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable state air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting for State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Regional Air Pollution Control Agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Regional Air Pollution Control Agency must be notified in writing of any transfer of this permit.

[Authority for term: OAC rule 3745-77-01(C)]

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) Where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) Where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) Where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

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 Regional Air Pollution Control 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

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. 40 CFR Part 63, Subpart A

   This facility is subject to 40 CFR Part 63, Subpart A, National Emission Standards for Hazardous Air Pollutants (NESHAP): General Provisions. The applicable provisions of 40 CFR Part 63, Subpart A (required for compliance with 40 CFR Part 63, Subpart DDDDD) are identified in Table 10. of 40 CFR Part 63, Subpart DDDDD.

3. 40 CFR Part 63, Subpart JJJJ

   Emissions Unit K002 is subject 40 CFR Part 63, Subpart JJJJ NESHAP for Paper and Other Web Coating. The applicable sections of 40 CFR Part 63, Subpart JJJJ have been cited in the terms and conditions for emissions unit K002.

4. 40 CFR Part 63, Subpart DDDDD

   Emissions Unit B001 is subject to 40 CFR Part 63, Subpart DDDDD, NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

   As defined in 40 CFR Part 63.7575 the "Unit designed to burn gas 1 subcategory" includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels; with the exception of liquid fuels used for periodic testing not to exceed a combined total of 48 hours during any calendar year, or during periods of gas curtailment and gas supply emergencies.

   Emission unit B001 only uses natural gas fuel and must comply with the Boiler MACT requirements in the table below.

   The requirements for the "unit designed to burn gas 1 subcategory" as identified in the following table:

40 CFR 63.7500	Emission limitations, work practice standards and operating limits
40 CFR 63.7505	General Compliance Requirements
40 CFR 63.7510	Testing, Fuel Analysis, and Initial Compliance Requirements
40 CFR 63.7530 (e) and (f)	Initial compliance demonstration
40 CFR 63.7540(a) and (c)	Continuous compliance with emissions limitations, fuel specifications and work practice standards
40 CFR 63.7545(a), (b), (e) and (f)	Notification requirements
40 CFR 63.7550	Reporting requirements
40 CFR 63.7560	Records form and retention

40 CFR 63.7565	General provisions
40 CFR 63.7575	Definitions

5. The following insignificant emissions units are located at this facility.

   B700 – Diesel Fire Water Pump (PBR14319, 10/8/2015)

   B709 – 100 KW natural gas fired back up generator (PBR 14150, 9/10/2015)

   F001 – Fugitive Dust, Parking Areas & Roadways

   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified Permit to Install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

6. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart ZZZZ, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines. The requirements of this rule, that are applicable to the area source(s) for hazardous air pollutants (HAP) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

   The following emissions units located at this facility are subject to 40 CFR, Part 63, Subpart ZZZZ.

   B700 – Diesel Fire Water Pump

   B709 – 100 KW natural gas fired back up generator

   By meeting the requirements of 40 CFR Part 60 Subpart JJJJ for spark ignition engines. No further requirements apply for such engines under this subpart.

7. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 60 Subpart JJJJ, the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines. The complete NSPS requirements of this rule, (including the Part 60 General Provisions) may be assessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

   The following emissions units located at this facility are subject to 40 CFR, Part 60, Subpart JJJJ:

   B709 – 100 KW natural gas fired back up generator

C. Emissions Unit Terms and Conditions

1. B001, Boiler #3

Operations, Property and/or Equipment Description:

Natural gas fired package boiler - 90,000 lb steam/hr.

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 3745-17-10(B)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 0.020 pound per million Btu (MMBtu) actual heat input. See b)(2)b.
b.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-18-06(A)	See b)(2)a.
d.	40 CFR Part 63, Subpart DDDDD	See Section B.4.

(2) Additional Terms and Conditions

a. Natural gas is the only fuel capable of being fired in this emissions unit; therefore, the SO2 emissions limitations of OAC rule 3745-18 are not applicable to this emissions unit.

b. The 0.020 pound of PE per MMBtu of actual heat input emissions limitation refers to the filterable portion of PE, as measured by U.S. EPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

c) Operational Restrictions

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

[Authority for term OAC rule 3745-18-06(A) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term OAC rule 3745-77-07(A)(3)]

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term OAC rule 3745-77-07(A)(3)]

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

The PE from this emissions unit shall not exceed 0.020 pound per mmBtu actual heat input.

Applicable Compliance Method

If requested, compliance will be demonstrated based on the results of emissions testing according to U.S. EPA Reference Method 5 of 40 CFR Part 60, Appendix A and OAC rule 3745-17-03(B)(9).

b. Emissions Limitation

Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule

Applicable Compliance Method

If requested, compliance will be demonstrated based on the results of emissions testing according to U.S. EPA Reference Method 9 of 40 CFR Part 60, Appendix A and OAC rule 3745-17-03(B)(1).

[Authority for term OAC rules 3745-17-03(B), OAC rule 3745-17-07(A)(1) and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. K002, #95 CM

Operations, Property and/or Equipment Description:

Off Machine Coating Line with Natural Gas Fired Dryers (No.95 CM)

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) PTI No. 08-04881	The nitrogen oxide (NOx) emissions from natural gas combustion in this emissions unit shall not exceed 5.05 pounds per hour and 22.2 tons per year (TPY). The carbon monoxide (CO) emissions from natural gas combustion in this emissions unit shall not exceed 6.87 pounds per hour and 30.1 TPY. See b)(2)a. Compliance with this rule also includes compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-09(F); and 40 CFR Part 63, Subparts A and JJJJ.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major New Source Review)	The volatile organic compound (VOC) emissions from coating use and natural gas combustion in this emissions unit shall not exceed 35.2 tons per rolling 12-month period.
d.	OAC rule 3745-21-09(F)	The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

e.	40 CFR Part 63, Subpart JJJJ, Paper and Other Web Coating MACT [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 8 percent of the mass of solids applied (0.08 kg organic HAP per kg coating solids), as a monthly average. See d)(3), e(3) and f)(1)h.
f.	40 CFR Part 63, Subpart A, General Provisions MACT [40 CFR 63.1-15]	Table 2 of 40 CFR Part 63, Subpart JJJJ identifies the applicable provisions of 40 CFR 63.1-15.

(2) Additional Terms and Conditions

a. The hourly NOx and CO emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

b. According to PTI 08-4881 the Best Available Technology (BAT) requirements under OAC rule 3745-31-5(A)(3) do not apply to the PE from this air contaminant source since the uncontrolled potential to emit for particulate is less than ten TPY. The potential PE from this emissions unit are de minimis (8.4 pounds per day and 1.53 tons per year) and not subject to emissions limitations.

c) Operational Restrictions

(1) The total VOC input from coatings applied on this emissions unit shall not exceed 68,170 pounds per rolling 12-month period of coatings usage.

[Authority for term PTI 08-04881 and OAC rule 3745-31-05(D)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit.

a. The company identification for each coating applied.

b. The VOC content of each coating, as applied, in pounds of VOC per gallon excluding water and exempt solvents.

[Authority for term OAC rules 3745-77-07(A)(3), 3745-21-09(F) and 3745-21-10(B)]

(2) The permittee shall collect and record the following information each month for this emissions unit.

a. The company identification for each coating applied.

b. The volume, in gallons, of each coating applied.

c. The VOC content of each coating, in pounds per gallon, as applied.

d. The VOC usage rate for all coatings, in pounds per month (the sum of b x c for all coatings applied).

e. The rolling, 12-month summation of the VOC usage figures.

[Authority for term PTI 08-04881, OAC rules 3745-31-05(D) and 3745-77-07(A)(3)]

(3) The permittee shall comply with the record keeping requirements of 40 CFR Part 63, Subpart JJJJ including the following sections:

63.3410(a)(iii), (iv) and (vi)	Monthly record keeping requirements
63.3360(c)	Organic HAP content
63.3360(d)	Volatile organic and coating solids
63.3370(b)	Compliant coatings
63.3370(c)	As-applied compliant coating
63.3370(d)	Monthly allowable organic HAP applied

[Authority for term 40 CFR 63.3280 - 40 CFR 63.3420]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded 2.9 lbs VOC/gallon, excluding water and exempt solvents. 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 45 days after the exceedance occurs.

[Authority for term OAC rules 3745-77-07(A)(3), 3745-21-09(B) and 3745-21-09(F)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following information:

a. all exceedances of the rolling 12-month emission limitation for VOC.

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

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-31-05(D)]

(3) The permittee shall comply with the reporting requirements of 40 CFR Part 63, Subpart JJJJ including the following sections:

63.3400(b)	Initial Notification
63.3400(c)	Semiannual reports
63.3400(e)	Notification of Compliance Status

[Authority for Term 40 CFR 63.3280 - 40.

(4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

Applicable Compliance Method

Compliance shall be based on coating formulation data and if requested, VOC content shall be determined according to the requirements of U.S. Reference Method 24 of 40 CFR Part 60, Appendix A. For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

b. Emissions Limitation:

The total VOC input from coatings applied on this emissions unit shall not exceed 68,170 pounds based upon a rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in d)(2) and shall be the sum of the present month plus the previous 11 months of operation in pounds.

c. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 35.2 TPY based upon a rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in d)(2) and shall be the sum of the present month plus the previous 11 months of operation in tons plus 1.1 tons potential VOC emissions from natural gas combustion in the process dryers. VOC emissions from natural gas combustion in the process dryers were determined by multiplying the maximum annual potential fuel combustion rate (398.6 million cubic feet) by the emissions factor of 5.5 lbs VOC per million cubic feet burned (AP-42, Table 1.4-1, 7/98), and dividing by 2000 lbs per ton.

d. Emission Limitation:

The NOx emissions from natural gas combustion in this emissions unit shall not exceed 5.05 lbs per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly potential fuel combustion rate (0.0455 million cubic feet) by the emissions factor of 111 lbs NOx per million cubic feet burned (emission factor developed by burner manufacturer).

e. Emission Limitation:

The NOx emissions from natural gas combustion in this emissions unit shall not exceed 22.2 TPY.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum annual potential fuel combustion rate (398.6 million cubic feet) by the emissions factor of 111 lbs NOx per million cubic feet burned (emission factor developed by burner manufacturer), and dividing by 2000 lbs per ton.

f. Emission Limitation:

The CO emissions from natural gas combustion in this emissions unit shall not exceed 6.87 lbs per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly potential fuel combustion rate (0.0455 million cubic feet) by the emissions factor of 151 lbs CO per million cubic feet burned (emission factor developed by burner manufacturer).

g. Emission Limitation:

The CO emissions from natural gas combustion in this emissions unit shall not exceed 30.1 TPY.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum annual potential fuel combustion rate (398.6 million cubic feet) by the emissions factor of 151 lbs CO per million cubic feet burned (emission factor developed by burner manufacturer), and dividing by 2000 lbs per ton.

h. Emission Limitation:

The organic HAP emissions from web coating in this emissions unit shall be limited to no more than 8 percent of the mass of solids applied (0.08 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:

Compliance shall be based on coating formulation data or the requirements identified in 40 CFR 63.3360(c) and (d).

[Authority for term OAC rules 3745-77-07(A)(3), and 40 CFR Part 63, Subpart JJJJ].

g) Miscellaneous Requirements

(1) None.