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

6/25/2013

Certified Mail

Judy Arvan
Graphic Packaging International Inc.
407 Charles Street
Middletown, OH 45042

Facility ID: 1409010021
Permit Number: P0109953
County: Butler

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 the local newspaper, Journal News. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. 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 Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Michael W. Ahern

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

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

PUBLIC NOTICE
6/25/2013 Issuance of Draft Air Pollution Title V Permit

Graphic Packaging International Inc.
407 Charles Street,
Middletown, OH 45042
Butler County
FACILITY DESC.: Paperboard Mills
PERMIT #: P0109953
PERMIT TYPE: Renewal
PERMIT DESC: Renewal of Title V Operating Permit for Graphic Packaging International, a boxboard manufacturing facility. The permit includes natural gas and oil-fired boilers and a paperboard manufacturing line.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Paul Tedtman, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

Statement of Basis For Air Pollution Title V Permit

Facility ID:	1409010021
Facility Name:	Graphic Packaging International Inc.
Facility Description:	Boxboard manufacturing
Facility Address:	407 Charles Street, Middletown, OH 45042
Permit #:	P0109953, Renewal

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
☐ Maximum Available Control Technology Standard(s) ☒ GHG ☐ Title IV

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes. The insignificant emissions units (IEUs) that have applicable state and/or federally-enforceable requirements are included in the terms and conditions in Section B. All other IEUs at this facility are excluded from the requirements to obtain installation or operating permits pursuant to OAC rules 3745-15-05 and 3745-31-03 and have no applicable federally enforceable requirements; therefore, these IEUs are not included in the terms and conditions of this permit pursuant to OAC rule 3745-77-07(A)(13).
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
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 minor permit modification per OAC rule 3745-77-08(C)(1)	N/A

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)	N/A
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)	N/A
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)	Renewal document incorporates changes due to recently promulgated area source MACT federal rules and updated SIP/OAC rules.
Please identify the affected 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.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.	77-07(A)(13)	N	Listing of insignificant emissions units that are subject to SIP-approved and/or federal regulations.
B.3. and B.4.	N	40 CFR Part 63	Clarifying and reference term regarding applicability of federal Area Source NESHAP rules.
B.5.	N	40 CFR Part 60	Clarifying and reference term regarding applicability of federal NSPS rules.

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)
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B004	1.0 lbs CO/hr (fuel oil)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per hour emission limitation for CO is based on the emissions unit's potential to emit. If required, emission testing using Method 10 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B004	0.14 lbNOx/MMBtu (fuel oil)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MmBtu emission limitation for NOx is based on the emissions unit's potential to emit. If required, emission testing using Method 7 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B004	0.020 lb PM10/MMBtu (fuel oil and natural gas)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MMBtu emission limitation for PM10 is based on the emissions unit's potential to emit. If required, emission testing using Method 201 will be performed when combusting these fuels. All requirements for this EU have been transferred from the PTI.
B004	0.04 lb VOC/hr (fuel oil)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per hour emission limitation for VOC is based on the emissions unit's potential to emit. If required, emission testing using Method 25 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.

B004	2.4 lbs CO/hr (natural gas)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per hour emission limitation for CO is based on the emissions unit's potential to emit. If required, emission testing using Method 10 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B004	0.1 lbNOx/MMBtu (natural gas)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MMBtu emission limitation for NOx is based on the emissions unit's potential to emit. If required, emission testing using Method 7 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B004	0.0006 lb SO2/MMBtu (natural gas)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MmBtu emission limitation for SO2 is based on the emissions unit's potential to emit. If required, emission testing using Method 6 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B004	0.16 lb VOC/hr (natural gas)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per hour emission limitation for VOC is based on the emissions unit's potential to emit. If required, emission testing using Method 25 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B004	10.51 TPY CO	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, RP, or ET is required. All requirements for this EU have been transferred from the PTI.
B004	17.8 TPY NOx	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, RP, or ET is required. All requirements for this EU have been transferred from the PTI.
B004	38.0 TPY SO2	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, RP, or ET is required. All requirements for this EU have been transferred from the PTI.

B004	2.5 TPY PE/PM10	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, RP, or ET is required. All requirements for this EU have been transferred from the PTI.
B004	0.70 TPY VOC	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, RP, or ET is required. All requirements for this EU have been transferred from the PTI.
B004	Visible particulate emissions shall not exceed 20% opacity as a six-minute average	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET –Inherently clean fuels.Method 9 visible emissions observations will be conducted if necessary to demonstrate compliance when burning No. 2 fuel oil or natural gas.
B004	0.020 lb PE/MMBtu	17-10(B)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MMBtu emission limitation for PE is greater than or equivalent to the emissions unit's potential to emit. If required, emission testing using Method 5 will be performed when combusting these fuels.
B004	SO2 shall not exceed 0.31 lb/MMBtu	18-15(E)(2)	N	N	Y	Y	N	Y	Y	N	N	N	OR- Fuel oil sulfur content restriction to ensure compliance with emission limitation. ET- Compliance with emission limitation determined by monitoring and record keeping requirements which include fuel analyses.
P002	476.4 lbs/day OC emissions	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per day emission limitation is based on the emissions unit's potential to emit. Therefore, no M, R, RP, or ET is required. All requirements for this EU have been transferred from the PTI .

P002	38.74 TPY OC emissions	N	OAC 3745-31-05 (D)	N	Y	Y	N	Y	Y	N	N	N	OR - Material usage restrictions to ensure compliance with emission limitation. ET - Compliance with annual emission limitation determined by monitoring and record keeping requirements. All requirements for this EU have been transferred from the PTI.
P002	2.9 lbs VOC/gallon of coating	21-09(F)	N	N	N	Y	N	Y	Y	Y	N	N	
B005, B006	0.16 lb CO/MMBtu (fuel oil and natural gas)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MMBtu emission limitation for CO is based on the emissions unit's potential to emit. If required, emission testing using Method 10 will be performed when combusting these fuels. All requirements for this EU have been transferred from the PTI.
B005, B006	0.18 lbNOx/MMBtu (fuel oil)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MMBtu emission limitation for NOx is based on the emissions unit's potential to emit. If required, emission testing using Method 7 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B005, B006	0.10 lbNOx/MMBtu (natural gas)	N	OAC 3745-31-05 (A)(3)										M, R, Rp, ET - The pound per MMBtu emission limitation for NOx is based on the emissions unit's potential to emit. If required, emission testing using Method 7 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B005, B006	0.02 lb PE/PM10 per MMBtu (fuel oil)	N	OAC 3745-31-05 (A)(3)										M, R, Rp, ET - The pound per MMBtu emission limitation for PE/PM10 is based on the emissions unit's potential to emit. If required, emission testing using Method 5 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B005, B006	0.01 lb PE/PM10 per MMBtu (natural gas)	N	OAC 3745-31-05 (A)(3)										M, R, Rp, ET - The pound per MMBtu emission limitation for PE/PM10 is based on the emissions unit's potential to emit. If required, emission testing using Method 5 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.

B005, B006	0.31 lb SO2/MMBtu (fuel oil)	N	OAC 3745-31-05 (A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR- Fuel oil sulfur content restriction to ensure compliance with emission limitation. ET- Compliance with emission limitation determined by monitoring and record keeping requirements which include fuel analyses. All requirements for this EU have been transferred from the PTI.
B005, B006	0.001 lb SO2/MMBtu (natural gas)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MMBtu emission limitation for SO2 is based on the emissions unit's potential to emit. If required, emission testing using Method 6 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B005, B006	0.025 lb VOC/MMBtu (fuel oil)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MMBtu emission limitation for VOC is based on the emissions unit's potential to emit. If required, emission testing using Method 25 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B005, B006	0.016 lb VOC/MMBtu (natural gas)	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - The pound per MMBtu emission limitation for VOC is based on the emissions unit's potential to emit. If required, emission testing using Method 25 will be performed when combusting this fuel. All requirements for this EU have been transferred from the PTI.
B005, B006	50.5 TPY CO*	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	Y	N	N	N	M, R, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, or ET is required. All requirements for this EU have been transferred from the PTI. *See footnote below regarding the PTI for these emissions units (PTI 14-04175).
B005, B006	56.8 TPY NOx*	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	Y	N	N	N	M, R, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, or ET is required. All requirements for this EU have been transferred from the PTI. *See footnote below regarding the PTI for these emissions units (PTI 14-04175).

B005, B006	97.8 TPY SO2*	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	Y	N	N	N	M, R, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, or ET is required. All requirements for this EU have been transferred from the PTI. *See footnote below regarding the PTI for these emissions units (PTI 14-04175).
B005, B006	6.3 TPY PE/PM10	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	Y	N	N	N	M, R, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, or ET is required. All requirements for this EU have been transferred from the PTI.
B005, B006	7.9 TPY VOC	N	OAC 3745-31-05 (A)(3)	N	N	N	N	N	Y	N	N	N	M, R, ET - The annual emission limitation is based on the emissions unit's potential to emit operating 8,760 hours/year. Therefore, no M, R, or ET is required. All requirements for this EU have been transferred from the PTI.
B005, B006	Visible particulate emissions shall not exceed 20% opacity as a six-minute average except for one 6-minute period per hour of not more than 27% opacity	N	40 CFR 60 Subpart Dc	N	N	Y	N	Y	Y	Y	N	N	

*For purposes of identifying to interested parties, pursuant to the Title V permitting requirements of the Clean Air Act, that certain previous permitting actions have occurred but are not explicitly stated above, the following Netting Demonstration was included in the terms and conditions of PTI 14-04175 issued 1/10/08 for emissions units B005 and B006:

1. This air permit to install (PTI) covers the Boiler Replacement Project at the Bluegrass Mills Holding Company LLC facility which involves the replacement of coal fired boiler (Ohio EPA emissions unit 1409010021 B003) with two new natural gas/Number 2 oil fired boilers (emissions units B005 and B006.)

The federally enforceable terms and conditions of this air permit-to-install (PTI) have been included for the purpose of netting out of Non-Attainment New Source Review (NNSR) and corresponding Ohio Administrative Code (OAC) regulations for nitrogen oxides (NOx), and netting out of Prevention of Significant Deterioration (PSD) for nitrogen oxides (NOx), sulfur dioxide (SO2), and carbon monoxide (CO) emissions. In order to verify that the emissions of these pollutants do not exceed the allowable

emission rates described in the netting table below, the permittee must comply with the limitations specified in each emission unit's respective terms and conditions. The other pollutants were considered in the context of the project's analysis, however they were not major for this project.

Following the NSR definitions in OAC rule 3745-31-01(III) and OAC rule 3745-31-01(O), the actual baseline emissions were based on the two years prior to the date of the original permit application for the Boiler Replacement Project, submitted May 29, 1996. The permittee used the period of 1994 - 1995 as the baseline for emissions calculations of the following pollutants: NOx, SO2, and CO emissions.

The following table summarizes the netting emissions. It includes all actual emissions from the coal boiler (emissions unit B003) at the facility that are being used in the baseline emission calculation and the two proposed natural gas/number 2 oil fired boilers in the potential emissions that demonstrates a significant emission increase and a significant net emission increase of PE, PM10, SO2, NOx, VOC, and CO does not occur as a result of the Boiler Replacement Project. Note that the net SO2 and NOx emissions are actually an emission decrease.

Table I. Summary of the change in emissions by pollutant and comparison of the emission increases/decreases to major NSR emission threshold levels:

Pollutant	Potential emissions/ allowable limits, tpy	Baseline Actual Emissions for shutdown coal boiler, tpy	Project net emissions, tpy	Major NSR significant emission rate, tpy
SO2	195.5	620.9	(425.4)	40
NOx	113.5	426.3	(312.8)	40
CO	100.9	10	90.9	100

2. On July 27, 2006, the permittee notified Ohio EPA that the old, coal burning boiler emissions unit B003 was being officially shutdown.

DRAFT

Division of Air Pollution Control
Title V Permit
for
Graphic Packaging International Inc.

Facility ID:	1409010021
Permit Number:	P0109953
Permit Type:	Renewal
Issued:	6/25/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Graphic Packaging International Inc.

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Authorization

Facility ID:	1409010021
Facility Description:	The facility manufactures and coats boxboard
Application Number(s):	A0043950
Permit Number:	P0109953
Permit Description:	Renewal of Title V Operating Permit for Graphic Packaging International, a boxboard manufacturing facility. The permit includes natural gas and oil-fired boilers and a paperboard manufacturing line.
Permit Type:	Renewal
Issue Date:	6/25/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance

Superseded Permit Number: P0096477

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

Graphic Packaging International Inc.
407 Charles Street
Middletown, OH 45042

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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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 Southwest Ohio Air Quality 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 (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

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

(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

(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 (i.e., postmarked) 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 scheduled maintenance, 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 promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) 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.19, A.20, A.21, 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air 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."

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

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Southwest Ohio Air Quality Agency.

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

3. 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) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and 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.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition 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(W) 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(W) 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(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(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 (18) 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 appropriate Ohio EPA District Office or local air 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 appropriate Ohio EPA District Office or local air 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 (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

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 [as defined in OAC rule 3745-77-01(JJ)], 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 appropriate Ohio EPA District Office or local air 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 appropriate District Office of the Ohio EPA or local air 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 emissions levels or activities as defined in OAC rule 3745-77-01(U). 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 Fed. Reg. 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 has 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(O)), 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.

No emissions unit 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 opening 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 RequirementsUnder 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 appropriate Ohio EPA District Office or local air 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 appropriate Ohio EPA District Office or local air 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder 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

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 appropriate Ohio EPA District Office or local air 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 appropriate Ohio EPA District Office or local air 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 (i.e., postmarked) 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 potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, 3745-31, and/or 40 CFR Part 60 or 63:

F001	Plant Roadways and Parking Areas
B009	Emergency Diesel-fired Sump Pump
P008	200 kW Diesel Emergency Generator [PBR09660]

3. The Ohio EPA has determined that this facility is subject to the area source requirements of 40 CFR Part 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for emissions units B004, B005, and B006. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

   (Authority for term: 40 CFR Part 63)

4. The Ohio EPA has determined that this facility is subject to the area source requirements of 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for emissions units B009 and P008. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

   (Authority for term: 40 CFR Part 63)

5. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (NSPS): B005 and B006. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

   (Authority for term: 40 CFR Part 60)

6. The following abbreviations are used throughout this permit.

   NOx = Nitrogen Oxides

   CO = Carbon Monoxide

OC = Organic Compounds

VOC = Volatile Organic Compounds

PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM_{10} = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

SO_2 = Sulfur dioxide

TPY = Tons per year

MMBtu = million British thermal units

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

SIP = State Implementation Plan

PSD = Prevention of Significant Deterioration

C. Emissions Unit Terms and Conditions

1. B004, Boiler 315

Operations, Property and/or Equipment Description:

28 MMBtu/Hour Natural Gas/Oil-Fired Boiler

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 14-01440, issued 8/27/2004)	See b)(2)a. through b)(2)c., c)(2), and c)(3). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1), and OAC rule 3745-18-15(E)(2).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
c.	OAC rule 3745-17-10(B)(1)	0.020 lb of PE/MMBtu of actual heat input.
d.	OAC rule 3745-18-15(E)(2)	SO_2 emissions shall not exceed 0.31 lb/MMBtu of actual heat input.

(2) Additional Terms and Conditions

a. When burning No.2 fuel oil, the following emission limitations shall not be exceeded:

1.0 lbs CO/hour;
0.14 lbNOx/MMBtu of actual heat input;
0.020 lb PM_{10}/MMBtu of actual heat input; and
0.04 lb VOC/hour.

The lb/MMBtu and pound per hour emission limitations for CO, NOx, PM_{10}, and VOC are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

b. When burning only natural gas, the following emission limitations shall not be exceeded:

2.4 lbs CO/hour;
0.1 lbNOx/MMBtu of actual heat input;
0.020 lb PM_{10}/MMBtu actual heat input;
0.0006 lb SO_2/MMBtu of actual heat input; and
0.16 lb VOC/hour.

The lb/MMBtu and pound per hour emission limitations for CO, NOx, PM_{10}, SO_2, and VOC are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

c. The following emission limitations shall not be exceeded:

10.51 TPY CO;
17.8 TPY NOx;
38.0 TPY SO_2;
2.5 TPY PE/PM_{10}; and
0.70 TPY VOC.

c) Operational Restrictions

(1) The quality of the No.2 fuel oil burned in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable SO_2 emission limitation of 0.31 pound SO_2/MMBtu actual heat input.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-18-15(E)(2))

(2) The permittee shall burn only natural gas and/or No.2 fuel oil in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(3) The sulfur content of the distillate fuel oil used in this emissions unit shall not exceed 0.3% by weight.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the oil burned in this emissions unit, in accordance with either Alternative 1 or Alternative 2 described below:

Alternative 1:

For each shipment of oil received for burning in this emission, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit, for each day when the emissions unit is in operation. If additional diesel fuel is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the diesel fuel burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit, is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-18-04(E))

(2) For each day during which the permittee burns a fuel other than natural gas and/or No.2 fuel oil, 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(C)(1) and OAC rule 3745-31-05(A)(3))

(3) The permitee shall maintain monthly records of the type and total amount of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-01440, issued on August 27, 2004: d)(1) – d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) 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(C)(1))

(2) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be submitted within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any fuel burned in this emissions unit other than natural gas or No. 2 fuel oil. The notification shall include a copy of such record and shall be submitted within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the sulfur content restriction in c)(3) of this permit.

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 rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-01440, issued on August 27, 2004: e)(1) - e)(4) The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

0.020 lb PE/MMBtu of actual heat input and 0.020 lb PM_{10}/MMBtu of actual heat input, when burning No. 2 fuel oil or natural gas, and 2.5 TPY PE/PM_{10}.

Applicable Compliance Method:

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs of filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr). All PE is assumed to be PM_{10}.

For the use of No. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 2.0 lbs of filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr). Compliance with the PM_{10} emission limitation may be determined by the AP-42, Fifth Edition, Section 1.3, Table 1.3-6 (revised 5/10) emission factor of 1.00 lbs of PM10/1000 gallons.

Compliance with the TPY annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitations is maintained.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations above pursuant to OAC rule 3745-17-03(B)(9) and USEPA Methods 1 through 4, 5 and 201, whichever is appropriate, of 40 CFR Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-10(B), and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

SO_2 emissions shall not exceed 0.31 lb/MMBtu of actual heat input when burning No.2 fuel oil.

SO_2 emissions shall not exceed 0.0006 lb/MMBtu of actual heat input when burning natural gas.

38 TPY SO_2.

Applicable Compliance Method:

For the use of No. 2 fuel oil, continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation pursuant to the record keeping requirements in d)(1).

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb of SO_2/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the TPY annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitations is maintained.

If required, the permittee shall demonstrate compliance with the lb/MMBtu limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E), and OAC 3745-31-05(A)(3))

c. Emission Limitations:

NOx emissions shall not exceed 0.14 lb/MMBtu of actual heat input when burning only No.2 fuel oil.

NOx emissions shall not exceed 0.1 lb/MMBtu of actual heat input when burning only natural gas.

17.8 TPY NOx.

Applicable Compliance Method:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 100 lbs of NOx/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 20 lbs of NOx/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitations is maintained.

If required, the permittee shall demonstrate compliance with the lb/MMBtu limitations in accordance with Method 7, 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitations:

CO emissions shall not exceed 2.4 lbs/hour when burning only natural gas.

CO emissions shall not exceed 1.0 lb/hour when burning No.2 fuel oil.

10.51 TPY CO.

Applicable Compliance Method:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 84 lbs of CO/MM cu. ft of natural gas.

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 5 lbs of CO/1000 gallons of fuel oil.

Compliance with the annual emission limitation shall be assumed as long as compliance with the pounds per hour limitations are maintained.

If required, the permittee shall demonstrate compliance with the pounds per hour emission limitations in accordance with Method 10, 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

e. Emission Limitations:

VOC emissions shall not exceed 0.16 lb/hour when burning only natural gas.

VOC emissions shall not exceed 0.04 lb/hour when burning No.2 fuel oil.

0.7 TPY VOC.

Applicable Compliance Method:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 5.5 lbs of VOC/MM cu. ft of natural gas.

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth

Edition, Section 1.3, Table 1.3-3 (revised 5/10) emission factor of 0.2 lb of VOC/1000 gallons of fuel oil.

Compliance with the annual emission limitation shall be assumed as long as compliance with the pound per hour limitations are maintained.

If required, the permittee shall demonstrate compliance with the pound per hour limitations in accordance with Method 25, 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

f. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

No Method 9 visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-01440, issued on August 27, 2004: f)(1)a.-f)(1)f. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

2. P002, Paper Machine

Operations, Property and/or Equipment Description:

Paperboard paper machine, including coater

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 14-03951, issued 5/30/1996)	See b)(2)a. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(F).
b.	OAC rule 3745-31-05(D) Synthetic Minor Limitation to Avoid Nonattainment New Source Review	See b)(2)a., c)(1), and c)(2).
c.	OAC rule 3745-21-09(F)	The surface coatings employed at the paper-coating section shall not exceed 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. The OC emissions from this emissions unit shall not exceed the following for paper making and paper coating combined:

476.4 pounds per day*; and
38.74 TPY**, based upon a rolling, 12-month summation.

*The daily OC emission limitation is based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation.

**The annual emission limitation is based on a material balance.

c) Operational Restrictions

(1) The percent by weight of organic compounds in the total annual coating and chemical material usage shall not exceed the following:

Paper-making (Wet End): 2.0
Film Formers (Paper Coating): 0.054
Primer Coating (Paper Coating): 0.215
Top Coating (Paper Coating): 0.120

The percent by weight of organic compounds specified above can be exceeded as long as the emission limitations specified in b)(2)a. are not exceeded.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

(2) The total annual coating and chemical material usage, in pounds, based on a rolling, 12-month summation, shall not exceed the following:

Paper-making (Wet End): 8,640,000
Film Formers (Paper Coating): 25,200,000
Primer Coating (Paper Coating): 11,400,000
Top Coating (Paper Coating): 16,800,000

The annual usage limitations specified above may be exceeded as long as the emission limitations specified in b)(2)a. are not exceeded.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records which list the following information for each surface coating and chemical material employed in paper-making, film forming, primer coating and top coating:

a. the company identification, and type (Paper-making, Film Formers, Paper Coating, or Top Coating) of each surface coating and chemical material;

b. the amount of each coating and chemical material employed, in pounds;

c. the OC content, in pounds of OC per gallon of coating, excluding water and exempt solvents, for each surface coating used for paper coating;

d. the percent by weight of OC for each coating and/or chemical material employed;

e. the total monthly usage of coatings and/or chemicals employed for each of the following operations: paper-making, film formers, primer coating and top coating;

f. the monthly OC emissions calculated by taking the summation of (b) times (d) for the paper-making, film formers, primer coating, and top coating operations. The OC emissions shall be calculated at an 11.1% evaporation rate, i.e. [∑(b) X (d)] X (1-.111) in accordance with the emissions data provided by the permittee with the application for PTI 14-03951;

g. the updated rolling, 12-month usage summation of coatings and/or chemicals employed for each of the following operations: paper-making, film formers, primer coating and top coating [the summation of the usages in (e) for the current month and the preceding eleven months[; and

h. the updated rolling, 12-month total OC emissions [the summation of the OC emissions in (f) for the current month and the preceding eleven months].

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03961, issued on May 30, 1996: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) 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(C)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports for any exceedance of the annual OC emission limitation and/or material usage limitations specified in b)(2)a., c)(1), and c)(2).

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 rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

(3) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be submitted within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-21-09(B)(3))

(4) This permittee shall submit semi-annual reports to the Southwest Ohio Air Quality Agency which contain monthly summaries of the following information for each coating/chemical material employed in Paper-making, Film Formers, Paper Coating, and Top Coating during the previous six calendar months:

a. the updated rolling total weight of all coatings and/or chemicals employed, in pounds;

b. the weight percent of organic compounds for the total annual coating/chemical usage; and

c. the rolling twelve month total of OC emissions, in tons.

The reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

The permittee shall immediately report to the Southwest Ohio Air Quality Agency any exceedances of the chemical/coating usage, emission limitations, and/or OC content limitations as outlined in this permit. Also, a copy of the monthly records showing the exceedance shall be submitted within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03951, issued on May 30, 1996: e)(1) – e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

476.4 pounds OC/day*; and
38.74 TPY OC, based on a rolling 12-month summation.

Applicable Compliance Method:

The short-term (pounds/day) emission limitation is based on the emissions unit's potential to emit. Compliance with the annual emission limitation shall be demonstrated by the record keeping requirements in d)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

b. Emission Limitation:

2.9 lbs VOC/gal coating excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitations specified above shall be determined by the record keeping requirements specified in d)(1). USEPA Methods 24 shall be used to determine the VOC content for coatings employed. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(B), and OAC rule 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03951, issued on May 30, 1996: f)(1)a.- f)(1)b. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Boilers No. 1 and 2: B005, B006

EU ID	Operations, Property and/or Equipment Description
B005	72 MMBtu/hr natural gas or No. 2 oil-fired boiler No. 1
B006	72 MMBtu/hr natural gas or No. 2 oil-fired boiler No. 2

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 14-04175, issued 1/10/2008) Netting determination for NOx, SO_2, and CO was developed under PTI 14-04175 to avoid Nonattainment New Source Review and PSD Review.	See b)(2)a. through b)(2)c., c)(1), and c)(2). The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Dc.
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is the same as or less stringent that the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and 40 CFR Part 60, Subpart Dc.
c.	OAC rule 3745-17-10(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 60, Subpart Dc [40 CFR 60.40c – 60.48c] Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average except for one 6-minute period per hour of not more than 27% opacity. [60.43c(c)]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The SO_2 emission limitation of 0.5 lb/MMBtu of actual heat input specified by this rule is less stringent than the SO_2 emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. When burning No.2 fuel oil, the following emission limitations shall not be exceeded by each emissions unit:

0.16 lb CO/MMBtu of actual heat input;
0.18 lbNOx/MMBtu of actual heat input;
0.02 lb PE and PM_{10}/MMBtu of actual heat input;
0.31 lb SO2/MMBtu of actual heat input; and
0.025 lb VOC/MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, VOC, PE/PM_{10}, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

b. When burning only natural gas, the following emission limitations shall not be exceeded by each emissions unit:

0.16 lb CO/MMBtu of actual heat input;
0.10 lbNOx/MMBtu of actual heat input;
0.01 lb PE and PM_{10}/MMBtu of actual heat input;
0.001 lb SO_2/MMBtu of actual heat input; and
0.016 lb VOC/MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, VOC, PE/PM_{10}, SO_2, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

c. The following annual emission limitations shall not be exceeded by each emissions unit:

50.5 TPY CO;
56.8 TPY NOx;
97.8 TPY SO_2;
6.3 TPY PE/PM_{10}; and
7.9 TPY VOC.

c) Operational Restrictions

(1) The quality of No. 2 fuel oil received for burning in each emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.31 lb/MMBtu of actual heat input and a sulfur content limit of less than or equal to 0.3 percent sulfur by weight.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall burn only natural gas and/or No.2 fuel oil in each emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the oil burned in each emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

Alternative 1:

For each shipment of oil received for burning in the emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in the emissions unit, for each day when the emissions unit is in operation. If additional diesel fuel is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the diesel fuel burned in the emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit, is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-

Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-18-04(E))

(2) For each day during which the permittee burns a fuel other than natural gas and/or No.2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in the emissions unit.

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

(3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart Dc, including the following sections:

60.47c(a), (b), (c), (e), and (f)	Opacity monitoring requirements
60.48c(c)(1)	Records of performance testing
60.48c(g)	Records of fuel usage
60.48c(i)	Record retention

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart Dc)

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04175, issued on January 10, 2008: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) 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(C)(1))

(2) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be submitted within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any fuel burned in the emissions units other than natural gas or Number 2 fuel oil. The notification shall include a copy of such record and shall be submitted within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) The permittee shall submit annual reports that specify the PE, PM_{10}, SO_2, NOx, CO, and VOC emissions for the emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year. The Title V Fee Emission Report (FER) required to be submitted annually by April 15 will also satisfy this emission reporting requirement.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(5) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart Dc, including the following sections:

60.48c(a)	Initial notification
60.48c(b)	Performance test data
60.48c(c)	Excess emission reports
60.48c(j)	Reporting periods

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart Dc)

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04175, issued on January 10, 2008: e)(1)-e)(5). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

0.02 lb PE/PM_{10}/MMBtu of actual heat input when burning No. 2 fuel oil;
0.01 lb PE/PM_{10}/MMBtu of actual heat input when burning natural gas; and
6.3 TPY PE/PM_{10}.

Applicable Compliance Method:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of No. 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 5.

Compliance with the 6.3 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.02 lb of PE/PM_{10} per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. Emission Limitations:

SO_2 emissions shall not exceed 0.31 lb/MMBtu of actual heat input when burning No.2 fuel oil.

SO_2 emissions shall not exceed 0.001 lb/MMBtu of actual heat input when burning natural gas.

97.8 TPY SO_2.

Applicable Compliance Method:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of No. 2 fuel oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation pursuant to the record keeping requirements in d)(1).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

Compliance with the 97.8 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.31 lb of SO2 per

MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(F), and OAC 3745-31-05(A)(3))

c. Emission Limitations:

NOx emissions shall not exceed 0.18 lb/MMBtu of actual heat input when burning only No.2 fuel oil.

NOx emissions shall not exceed 0.1 lb/MMBtu of actual heat input when burning only natural gas.

56.8 TPY NOx.

Applicable Compliance Method:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of No. 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

Compliance with the 56.8 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.18 lb of NOx per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitations:

CO emissions shall not exceed 0.16 lb/MMBtu of actual heat input when burning only natural gas.

CO emissions shall not exceed 0.16 lb/MMBtu of actual heat input when burning No.2 fuel oil.

50.5 TPY CO.

Applicable Compliance Method:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of No. 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 10.

Compliance with the 50.5 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.16 lb of CO per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

e. Emission Limitations:

VOC emissions shall not exceed 0.016 lb/MMBtu of actual heat input when burning only natural gas.

VOC emissions shall not exceed 0.025 lb/MMBtu of actual heat input when burning No.2 fuel oil.

7.9 TPY of VOC.

Applicable Compliance Method:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of No. 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 25.

Compliance with the 7.9 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.025 lb of VOC per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

f. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

Compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9, including the requirements of 40 CFR 60.45c, 60.47c, and 60.48c.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart Dc.)

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04175, issued on January 10, 2008: f)(1)a.-f)(1)f. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.