



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: PERMIT TO INSTALL MODIFICATION
MONTGOMERY COUNTY
Application No: 08-03477

CERTIFIED MAIL

DATE: 7/6/00

Fraser Papers Inc
Harold Nelson
51 S Elm St
West Carrollton, OH 45449

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

RAPCA



**Permit To Install
Terms and Conditions**

**Issue Date: 7/6/00
Effective Date: 7/6/00**

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-03477

Application Number: **08-03477**
APS Premise Number: **0857190134**
Permit Fee: **\$400**
Name of Facility: **Fraser Papers Inc**
Person to Contact: **Harold Nelson**
Address: **51 S Elm St
West Carrollton, OH 45449**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**51 S Elm St
West Carrollton, OHIO**

Description of modification:
Modification of PTI #08-3477, issued July 22, 1998, to reflect new monitoring, recordkeeping, reporting, and compliance requirements per OAC rules and NSPS, Subpart Dc.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. 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.

5. 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.

6. 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. 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.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. 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.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

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Facility ID: **0857190134**

3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

3. 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.

4. 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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

7. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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9. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate	22.90
SO ₂	162.06
CO	109.50
OC	3.07
NO _x	87.60
Pb	0.009

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations, property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
100 mmBtu/hr bubbling fluidized bed boiler that fires a combination of coal, paper/deinking mill sludge, natural gas, #2 fuel oil, and wood pallets with baghouse; unit #7	OAC rule 3745-31-05 (D) Synthetic Minor Restriction
	40 CFR 60, Subpart Dc
	OAC rule 3745-17-10 (C)(1)
	OAC rule 3745-17-07 (A)
	OAC rule 3745-18-63 (A)
	OAC rule 3745-23-06 (B)

Fraser

PTI A

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Applicable Emissions Limitations/Control Measures	
0.37 lb/mmBtu SO ₂ , as a 30-day rolling average;	A.III.12., A.III.13, A.IV.2., A.IV.4., A.V.3., and A.VI.
162.06 TPY SO ₂ , as a rolling, 365-day summation;	90 % SO ₂ reduction efficiency, as a 30-day rolling average;
See Section A.2.b. for SO ₂ emission control measures;	Opacity shall not exceed 20 percent as a 6-minute average, except for one 6-minute period in any one hour when up to 27% is permissible;
0.20 lb/mmBtu NO _x , as a 30-day rolling average;	See Sections A.2.i., A.2.k., A.2.l., A.2.m., A.2.n., A.2.o., A.III.1., A.III.3., A.III.4., A.III.5., A.III.6., A.III.9., A.III.10., A.III.11., A.III.12., A.III.13., A.IV.1., A.IV.6., and A.V.2.
87.60 TPY NO _x , as a rolling, 365-day summation;	See Section A.2.e. below
See Section A.2.c. for NO _x emission control measures;	See Section A.2.f. below
0.05 lb/mmBtu particulate emissions (PE);	See Section A.2.f. below
21.90 TPY PE;	See Section A.2.g. below
See Section A.2.d. for particulate emission control measures;	See Section A 2.e. below
See Sections A.2.b., A.2.c., A.2.d., A.2.j., A.2.p., A.II., A.III.11.,	See Section A.2.h. below

2. Additional Terms and Conditions

- 2.a The primary fuels of this emissions unit are coal and paper/deinking mill sludge. Therefore, Fraser Papers must demonstrate compliance with 40 CFR Part 60.42c (e)(1) and (e)(2). These requirements represent a SO₂ emission rate and reduction efficiency more stringent or as stringent as all other fuel combinations specified in 40 CFR Part 60.42c.
- 2.b Sulfur dioxide emissions from this emissions unit shall be controlled through the dry scrubbing provided by the calcium carbonate in the paper/deinking mill sludge and shall be sufficient to comply with the allowable SO₂ emission rate and percent reduction limitations specified in Section A.I.1.
- 2.c The nitrogen oxide emissions from this emission unit shall be controlled through a combination of fluidized bed combustion and ammonia injection and shall be sufficient to comply with the allowable NO_x emission rate limitation specified in Section A.I.1.
- 2.d The particulate emissions from this emissions unit shall be controlled through the application of a baghouse with a sufficient removal efficiency to comply with the allowable particulate emission rate limitation specified in Section A.I.1.
- 2.e The sulfur dioxide lb/mmBtu emission limitations based on 40 CFR Part 60, Subpart Dc and OAC rule 3745-18-63 (A) are less stringent than the sulfur dioxide emission limitation in accordance with the best available technology requirements specified in OAC rule 3745-31-05 (D).
- 2.f The particulate lb/mmBtu emission limitations based on 40 CFR Part 60, Subpart Dc and OAC rule 3745-17-10 (C)(1) are less stringent than the particulate emission limitation in accordance with the best available technology requirements specified in OAC rule 3745-31-05 (D).
- 2.g The opacity limitation based on OAC rule 3745-17-07 (A) is less stringent than the opacity limitation in accordance with 40 CFR Part 60, Subpart Dc.
- 2.h The NO_x control requirement based on OAC rule 3745-23-06 (B) is as stringent as the NO_x control requirement in accordance with the best available technology requirements specified in OAC rule 3745-31-05(D).
- 2.i Prior to the installation of the continuous SO₂ monitoring system, the permittee shall submit information detailing the proposed location of the sampling site(s) in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 6

for approval by the Ohio EPA, Central Office.

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup, the permittee shall conduct certification tests of the continuous SO₂ monitoring system pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the test is completed. Copies of the test results shall be sent to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office. Certification of the continuous SO₂ monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6.

- 2.j Prior to the installation of the continuous NO_x monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the Ohio EPA, Central Office.

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the test is completed. Copies of the test results shall be sent to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office. Certification of the continuous NO_x monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6.

- 2.k Prior to the installation of the continuous opacity monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 1 for approval by the Ohio EPA, Central Office.

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup, the permittee shall conduct certification tests on the continuous opacity monitoring system equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 1. Personnel from the appropriate Ohio EPA District Office or local air

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agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency pursuant to OAC rule 3745-15-04 within 30 days after the test is completed. Certification of the continuous opacity monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I), and 40 CFR Part 60, Appendix B, Performance Specification 1 including section 5.1.9 (mandatory).

- 2.1 In accordance with 40 CFR 60.46c(c)(3), the span value of the SO₂ CEMS at the outlet of the steam generating unit shall be 50 percent of the maximum estimated hourly potential SO₂ emission rate of the fuel combusted.
- 2.m In accordance with 40 CFR 60.47c(b), the span value of the opacity CEMS shall be between 60 and 80 percent.
- 2.n In accordance with 40 CFR 60.46c(c)(2), the permittee shall perform quarterly accuracy determinations and daily calibration drift test in accordance with Procedure 1 (appendix F).
- 2.o In accordance with 40 CFR 60.42c(I), the SO₂ emission limit and percent reduction requirements shall apply at all times, including periods of startup, shutdown, and malfunction.
- 2.p The use of paper sludge generated from a site other than Fraser Papers, Inc., Ohio EPA ID 0857190134, in this emissions unit is specifically prohibited, unless the requisite air permit to install is first obtained, in accordance with OAC rule 3745-31-02.

II. Operational Restrictions

- 1. The maximum firing rate of wood pallets shall not exceed 10 per day.
- 2. The quality of coal and sludge burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.1. above.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect a representative grab sample of each shipment of the coal that is received for burning in this emissions unit. The permittee shall perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical

methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isotherm Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall collect a representative grab sample each day of the sludge that is generated for burning in this emissions unit. The permittee shall perform the sludge sampling in accordance with the following procedures:
 - a. Collect and weigh each daily grab sample of the "as-fired" sludge.
 - b. Record the % solids.
 - c. Dry the "as-fired" sludge sample.
 - d. Calculate and record the % moisture.

At the end of each calendar month, all of the grab samples collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of sludge shall be analyzed for sulfur content (percent) and heat content (Btu/pound of sludge). The analytical methods for sulfur content and heat content shall be ASTM method D129, Standard Test for Sulfur in Petroleum Products (General Bomb Method) and ASTM method D240*, Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter, (* modified to a minimum of four tests with a calculated average), respectively. Alternative, equivalent methods may be used based upon written approval by the appropriate Ohio EPA District Office or local air agency.

3. The permittee shall require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency. A shipment may be comprised of multiple tank truck loads from the same supplier's

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batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

4. The permittee shall maintain monthly records of the following information:
 - a. The total quantity of coal received and the permittee's monthly composite analysis for ash content, sulfur content, and heat content;
 - b. The total quantity of sludge generated and the permittee's monthly composite analysis for sulfur content and heat content; and
 - c. The total quantity of oil received and the oil supplier's analyses for sulfur content and heat content.

5. The permittee shall install, operate, and maintain equipment to continuously monitor and record SO₂ from this emissions unit in parts per million and pounds per hour. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous SO₂ monitoring system including, but not limited to, parts per million SO₂ on an instantaneous (one-minute) basis, emissions of SO₂ in pounds on a hourly average and a daily basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

6. Within 180 days after the initial startup date, the permittee shall develop a written quality assurance/quality control plan for the continuous SO₂ monitoring system designed to ensure continuous valid and representative readings of SO₂. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous SO₂ monitoring system must be kept on site and available for inspection during regular office hours.

7. The permittee shall install, operate, and maintain equipment to continuously monitor and record NO_x from this emissions unit parts per million and pounds per hour. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous NO_x monitoring system including, but not limited to, parts per million NO_x on an instantaneous (one-minute) basis, emissions of NO_x in pounds on a hourly average and a daily basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

8. Within 180 days after the initial startup date, the permittee shall develop a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

9. The permittee shall install, operate, and maintain the continuous opacity monitoring system equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) basis, daily zero/span calibration checks, and manual calibration adjustments.

10. Within 180 days after the initial startup date, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

11. The permittee shall maintain records of the following information on a daily basis:

- a. The identification of each type of fuel burned;
- b. The quantity of each fuel type burned;
- c. The SO₂ emission rate, in pounds per day, i.e., the summation of each average hourly emission rate as recorded according to Section A.III.5;
- d. The rolling, 365-day, summation of the SO₂ emissions rate, in tons per year, i.e., the summation of A.III.11.c. for that day and the previous 364 days and divided by 2000 lbs/ton;
- e. The NO_x emission rate, in pounds per day, i.e., the summation of each average hourly emission rate as recorded according to Section A.III.7; and
- f. The rolling, 365-day, summation of the NO_x emissions rate, in tons per year, i.e., the summation of A.III.11.e. for that day and the previous 365 days and divided by 2000 lbs/ton.

12. The permittee shall maintain records of the following information on a monthly basis:

- a. The heat content of each fuel burned during the month;

- b. The total mmBtu heat input for each day, i.e., the summation of the products of (A.III.11.b.) X (A.III.12.a.) for all fuels burned;
 - c. The sulfur content of each fuel burned, in percent by weight;
 - d. The potential (pre-controlled) SO₂ emissions, in pounds/day, i.e., the summation of the products of (A.III.11.b.) X (A.III.12.c.) X 2 for all fuels burned; and
 - e. The potential (pre-controlled) SO₂ emissions, in lb/mmBtu, i.e., (A.III.12.d.) / (A.III.12.b.).
13. The permittee shall calculate and maintain records of the following for each day of operation at the end of each month:
- a. The daily SO₂ emission rate, in pounds per mmBtu, i.e., (A.III.11.c.) / (A.III.12.b.);
 - b. The 30-day rolling average SO₂ emission rate, in pounds per mmBtu; i.e., the summation of (A.III.13.a.) for that day and the previous 29 days divided by 30;
 - c. The daily SO₂ percent reduction, i.e. (A.III.12.e. - A.III.13.a.) / A.III.12.e. X 100(%);
 - d. The 30-day rolling average percent reduction, i.e., the summation of (A.III.13.c) for that day and the previous 29 days divided by 30;
 - e. The daily NO_x emission rate, in pounds per mmBtu, i.e., (A.III.11.e.) / (A.III.12.b.); and
 - f. The 30-day rolling average NO_x emission rate, in pounds per mmBtu; i.e., the summation of (A.III.13.d.) for that day and the previous 29 days divided by 30.

IV. Reporting Requirements

- 1. The permittee shall submit the following information on a quarterly basis in accordance with 40 CFR 60.48c(e):
 - a. Calendar dates covered in the reporting period;
 - b. Each 30-day average SO₂ emission rate, calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for noncompliance with the emission standards; and a description of corrective actions taken;
 - c. Each 30-day average percent reduction of the potential (the pre-controlled emission rate, as calculated in A.III.13.) SO₂ emission rate calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for noncompliance with the emission standards; and a description of corrective actions taken;

- d. Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which coal or oil were not combusted in the steam generating unit;
- e. Identification of any times when the pollutant concentration exceeded the full span of the CEMS;
- f. Description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specifications 2 or 3;
- g. Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1; and
- h. Copies of the oil supplier's analyses for oil which is received for burning in this emissions unit including the name of the oil supplier and a statement that the oil complies with the specifications in 40 CFR 60.41c.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall also submit the following information on a quarterly basis:
 - a. The total quantity of coal burned, in tons;
 - b. The total quantity of sludge burned, in tons;
 - c. The total quantity of oil burned, in gallons;
 - d. The total quantity of natural gas burned, in cubic feet;
 - e. Each 30-day average NO_x emission rate, calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for noncompliance with the emission standards; and a description of corrective actions taken;
 - f. Each 365-day rolling SO₂ emission rate, calculated during the reporting period, ending with the last 365-day period in the quarter; reasons for noncompliance with the emission standards; and a description of corrective actions taken; and
 - g. Each 365-day rolling NO_x emission rate, calculated during the reporting period, ending with the last 365-day period in the quarter; reasons for noncompliance with the emission standards; and a description of corrective actions taken.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting the date, commencement and completion times, duration magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO₂ values in excess of the limitations specified in Section A.I.1. These reports shall also contain the total SO₂ emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting any continuous SO₂ monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

4. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NO_x values in excess of the limitations specified in Section A.I.1. These reports shall also contain the total NO_x emissions for the calendar quarter (in tons).

Emissions Unit ID: **B005**

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting any continuous NO_x monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

5. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting all instances of opacity values in excess of the limitations specified in Section A.I.1., detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

6. The permittee shall submit notification, to the appropriate OEPA District Office or local air agency, with the date of construction or reconstruction, anticipated startup, and actual startup in accordance with 40 CFR Part 60.48c (a) and Section A. of the General Terms and Conditions.

The notification shall also include the following in accordance with 40 CFR part 60.48c (a).:

- a. The design heat input capacity of the affected facility and identification of the fuels to be combusted in the affected facility;
- b. If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels; and
- c. The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

V. Testing Requirements

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
0.37 lb/mmBtu SO₂, as a 30-day rolling average

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section A.III.5. and Sections A.III.11. - A.III.13. A new average SO₂ emission rate for 30 consecutive steam generating unit operating days will be calculated at the end of each steam generating operating day.
 - b. Emission Limitation -
162.06 TPY SO₂, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.11.
 - c. Emission Limitation -
0.20 lb/mmBtu NO_x, as a 30-day rolling average

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section A.III.7. and

Emissions Unit ID: B005

Sections A.III.11. - A.III.13. A new average NO_x emission rate for 30 consecutive steam generating unit operating days will be calculated for the end of each steam generating operating day.

- d. Emission Limitation -
87.60 TPY NO_x, as a rolling, 365-day summation
- Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.11.
- e. Emission Limitation -
0.05 lb/mmBtu particulate emissions
- Applicable Compliance Method -
Compliance was demonstrated August 11, 1999 with the average hourly rate of 0.34 lbs/hr particulate emissions and 0.004 lb/mmBtu particulate emissions during coal and paper/deinking mill sludge combustion by way of methods 1-5 of 40 CFR Part 60, Appendix A. If additional testing is required, compliance with the mass emission limitations shall be based upon stack testing in accordance with methods 1-5 of 40 CFR Part 60, Appendix A, and the requirements of OAC rule 3745-17-03 (B)(8).
- f. Emission Limitation -
21.90 TPY particulate emissions
- Applicable Compliance Method -
The 21.90 TPY limitation was developed by multiplying the 0.05 lb/mmBtu emission limitation by the maximum hourly heat input capacity of the emissions unit (100 mmBtu/hr) and the maximum operating schedule of 8,760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/mmBtu limitation, compliance will also be shown with the annual limitation.
- g. Emission Limitation -
90 % SO₂ reduction efficiency, as a 30-day rolling average
- Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Sections A.III.11. - A.III.13.
- h. Emission Limitation -
20% visible emission opacity limit, as a 6-minute average except for one 6-minute average any hour when up to 27% is permissible
- Applicable Compliance Method -
Visible emission evaluations using the methods and procedures specified in USEPA

Reference Method 9 may be taken at any time the emissions unit is in operation by qualified observers certified in accordance with USEPA RM 9, 40 CFR Part 60, Appendix A, section 3., Qualifications and Testing. The frequency of USEPA RM 9 evaluations shall be at a minimum semi-monthly. For any periods of time where the COM is out of service for 24 hours or longer, the minimum RM 9 evaluation frequency shall be not less than daily.

2. The permittee shall conduct an initial performance test to be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the SO₂ emission limitation and the percent reduction requirements shall be determined using a 30-day average. The first operating day included on the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup of the facility. The steam generating unit load during the maximum design heat input capacity, but must be representative of future operating conditions.
3. The permittee shall conduct an initial performance test to be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the NO_x emission limitation requirement shall be determined using a 30-day average. The first operating day included on the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup of the facility. The steam generating unit load during the maximum design heat input capacity, but must be representative of future operating conditions.

VI. Miscellaneous Requirements

1. This PTI is based, in part, on the complete decommissioning of two existing coal-fired boilers identified as Ohio EPA emissions units 0857190134 B002 and B003. Upon the startup of boiler B005, existing emissions units B002 and B003 shall be decommissioned and removed from the premises. These emissions units will also be subsequently removed from Ohio EPA's Air Permit Records, STARDUST.
2. With the installation and operation of the new emission unit B005 and the permanent shutdown of emissions units B002 and B003, the net change in emissions are as follows:

<u>Pollutant</u>	<u>New Emissions Unit B005</u>	<u>Existing Emissions Units B002 & B003</u>	<u>Net Change</u>
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				Emissions Unit ID: B005
	PM	21.90	18.63	+ 3.27 (TPY)
SO ₂		162.06	150.10	+ 11.96 (TPY)
CO		109.50	59.19	+ 50.31 (TPY)
VOC		3.07	7.00	- 3.93 (TPY)
NO _x		87.60	51.10	+ 36.50 (TPY)
Pb		0.009	0.004	+ 0.005 (TPY)

As a result of the net change in emissions, the proposed new source installation is non-major and the permittee has "netted out" of Federal Prevention of Significant Deterioration requirements.

- Emission unit B004 was authorized by way of Ohio EPA Permit to Install Number 08-126, issued February 14, 1978. The PTI identified B004 as a standby unit for coal-fired boiler #5, emissions unit B001. As defined by OAC rule 3745-17-01(B)(20), "Stand by fuel burning equipment" means any fuel burning equipment which is used only as a direct substitution for other fuel burning equipment for a limited period due to unpredictable and unavoidable breakdown or failure, or routine scheduled maintenance of such other fuel burning equipment.

During the removal of emissions units B002 and B003 and the installation of B005, emission unit B004 shall be allowed to operate on a supplemental basis for the coal-fired boiler, B001.

- During this transitional period, the total heat input for B004 shall be derated from 196 mmBtu/hr to 52 mmBtu/hr. (This derated total heat input corresponds to a steam load of 34,000 pounds/hr).
- Upon startup of emissions unit B005, emissions unit B004 shall return to the status of "standby fuel burning equipment" and the operational restriction of 52 mmBtu/hr for emissions unit B004 shall no longer apply.
- At no time shall the steam flow rate from B004 exceed 34,000 pounds per hour, as an average over any one hour period.
- The maximum annual operating hours for B004 shall not exceed 4380 while burning natural gas.
- The permittee shall continuously monitor and record the steam flow from B004.
- The permittee shall maintain monthly records of the operating hours, while burning natural gas, for B004.
- If for any reason the steam flow rate from B004 exceeds 34,000 pounds per hour, the following information shall be reported within 5 business days after the exceedance:
 - The date of the exceedance;
 - The time interval over which the exceedance occurred;
 - The value of the exceedance;

- d. The cause(s) of the exceedance;
 - e. The corrective action which has been or will be taken to prevent similar exceedances in the future; and,
 - f. A copy of the steam chart which shows the exceedance.
11. The permittee shall submit annual reports which identify any exceedances of the annual operating hours limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year and upon completion of this transitional period.

B. State Only Enforceable Section

I Applicable Emissions Limitations and/or Control Requirements

1. The specific operations, property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
100 mmBtu/hr bubbling fluidized bed boiler that fires a combination of coal, paper/deinking mill sludge, natural gas, #2 fuel oil, and wood pallets with baghouse; unit #7	OAC rule 3745-31-05	0.37 lb/mmBtu SO ₂ , as a 30-day rolling average; 162.06 TPY SO ₂ , as a rolling, 365-day summation; See Section A.2.b. for SO ₂ emission control measures; 0.20 lb/mmBtu NO _x , as a 30-day rolling average; 87.60 TPY NO _x , as a rolling, 365-day summation; See Section A.2.c. for NO _x emission control measures; 0.05 lb/mmBtu particulate emissions (PE) and 21.90 TPY PE; See Section A.2.d. for particulate emission control measures; 0.25 lb/mmBtu carbon monoxide and 109.50 TPY CO; 10% opacity visible emissions

2. **Additional Terms and Conditions**

2.a See Section A.I.2.

II. Operational Restrictions

1. See Section A.II.

III. Monitoring and/or Recordkeeping Requirements

1. See Section A.III.

IV. Reporting Requirements

1. See Section A.IV.
2. The permittee shall submit annual reports which specify the total particulate and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
0.37 lb/mmBtu SO₂, as a 30-day rolling average

Applicable Compliance Method -
See Section A.V.1.a.
 - b. Emission Limitation -
162.06 TPY SO₂, as a rolling, 365-day summation

Applicable Compliance Method -
See Section A.V.1.b.
 - c. Emission Limitation -
0.20 lb/mmBtu NO_x, as a 30-day rolling average

Applicable Compliance Method -
See Section A.V.1.c.

- d. Emission Limitation -
87.60 TPY NO_x, as a rolling, 365-day summation

Applicable Compliance Method -
See Section A.V.1.d.

- e. Emission Limitation -
0.05 lb/mmBtu particulate emissions

Applicable Compliance Method -
See Section A.V.1.e.

- f. Emission Limitation -
21.90 TPY part.

Applicable Compliance Method -
See Section A.V.1.f.

- g. Emission Limitation -
0.25 lb/mmBtu CO

Applicable Compliance Method -
Compliance was demonstrated on August 11, 1999 with the average hourly rate of 0.64 lbs/hr CO and 0.007 lb/mmBtu CO during coal and paper/deinking mill sludge combustion by way of methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A. If additional testing is required, compliance with the mass emission limitations shall be based upon stack testing in accordance with methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A.

- h. Emission Limitation -
109.50 TPY CO

Applicable Compliance Method -
The 109.50 TPY limitation was developed by multiplying the 0.25 lb/mmBtu emission limitation by the maximum hourly heat input capacity of the emissions unit (100 mmBtu/hr) and the maximum operating schedule of 8,760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/mmBtu limitation, compliance will also be shown with the annual limitation.

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Fraser Papers Inc
PTI Application: 08-03477
Modification Issued: 7/6/00

Emissions Unit ID: **P005**
Facility ID: **0857190134**

- i. Emission Limitation -
10% opacity, as a 6-minute average

Applicable Compliance Method -
See Section A.V.1.h.

VI. Miscellaneous Requirements

None.

Modification Issued: 7/6/00

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Fly Ash Handling System Ash Silo	OAC rule 3745-17-11	7.41 lbs particulate emissions (PE)/hr
Loading of Truck	OAC rule 3745-17-07 (B)	20 % opacity, as a three-minute average

2. Additional Terms and Conditions

- 2.a The maximum emissions rate for this emissions unit is 0.006 lbs particulate/hr (refer to the compliance methodology in Section A.V.). Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with the 7.41 lbs/hr limitation as stated in OAC rule 3745-17-11.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emissions limitation(s) in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation -
7.41 lbs particulate/hr

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly generation rate (2.42 tons fly ash) by an emission factor 0.27 lb particulate/ton material generated, taken from "AP-42 Chapter 11.12-2. (10/86)." The results shall then be multiplied by a fabric filter control factor of 99% (1 - 0.99).

- b. Emissions Limitation -
20 % opacity, as a three-minute average

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Reference Method 9.

VI. Miscellaneous Requirements

None

Modification Issued: 7/6/00**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Fly Ash Handling System Ash Silo	OAC rule 3745-31-05	<p>1.0 TPY particulate emissions (PE)</p> <p>The silo shall be adequately enclosed and vented to the fabric filter; the enclosure shall be sufficient to eliminate visible emissions of fugitive dust at the point of capture.</p> <p>The fabric filter shall achieve an outlet emission rate of not greater than 0.020 grain of particulate emission per dry standard cubic foot of exhaust gases or there shall be no visible emission from the outlet, whichever is less stringent.</p>
Loading of Truck		<p>The visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average.</p>

2. Additional Terms and Conditions

Modification Issued: 7/6/00

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the amount of ash generated, in tons.
2. The permittee shall perform daily checks, while the equipment is in operation, for any visible particulate emissions from the control system. The presence or absence of any visible emissions from the control systems shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

IV. Reporting Requirements

1. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the fabric filter control systems and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or Local Air Agency).

V. Testing Requirements

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
0.020 gr/dscf

Applicable Compliance Method -
If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(7).
 - b. Emission Limitation -
No visible emissions

Applicable Compliance Method -

Emissions Unit ID: P005

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(4) using methods and procedures specified in USEPA Method 22.

- c. Emission Limitation -
20 % opacity, as a three-minute average

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Reference Method 9.

- d. Emission Limitation -
1.0 TPY particulate

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in Section B.III. and shall be the summation of the 12 monthly tons of ash generated. The results shall then be multiplied by an emission factor 0.27 lb particulate/ton material generated, taken from "AP-42 Chapter 11.12-2. (10/86)." The results shall then be multiplied by a fabric filter control factor of 99% (1 - 0.99).

VI. Miscellaneous Requirements

None